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**WINTER USE PLANS
FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME III
PARTS II AND III**

*for the
Yellowstone and
Grand Teton National Parks
and
John D. Rockefeller, Jr.,
Memorial Parkway*

U.S. Department of the Interior
National Park Service

2001-008841/NF

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INTRODUCTION

Due to the large volume of comments, comments and responses in this section occur in several forms. Where a "summary comment" is indicated, it is a paraphrasing of many individual comments having the same basic context. A "summary response" therefore responds to all who commented in like fashion. Where a "comment" is indicated, normally this is a singular comment in the words of the person who commented. The "response" directed toward that individual comment. In some instances, a general response is given to a series of individual comments.

14

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PART II
FORM LETTER COMMENTS AND RESPONSES

54 Forest Oaks
Durham, North Carolina 27705
November 17, 1999

RECEIVED
Architect
NOV 22 1999

Mr. Clifford Hawkes
National Park Service
12795 West Alameda Parkway
Lakewood, Colorado 80228

Dear Mr. Hawkes:

Thank you for the opportunity to submit the following comments on the Draft Environmental Impact Statement for winter use management in Yellowstone and Grant Teton National Parks and John D. Rockefeller Memorial Parkway. I oppose the preferred alternative and the other alternatives offered in the Draft. None of these alternatives provides the necessary protection of wildlife, ecology, air and water quality, or serenity and solitude in the parks.

For more than 30 years, the National Park Service has permitted snowmobiling to adversely impact the parks' wildlife and ecology. The grooming of snowmobile trails has intensified the adverse impacts on wildlife, including threatened and endangered species. This is entirely inconsistent with National Park Service statutes, which require it to preserve nature as it exists, and its regulations, which prohibit trail grooming and activities that disturb wildlife.

Snowmobile use has impacted a number of park species, but none more so than Yellowstone bison. Bison use the groomed snowmobile trails as energy efficient travel routes, resulting in substantial impacts to population dynamics, and alterations to bison distribution, movement and habitat use patterns. The groomed trails facilitate bison emigration from the park, where the majority of bison are captured, slaughtered or gunned down by Montana state officials.

To make matters worse, snowmobiles are highly polluting. Not only are snowmobile emissions the principal source of air pollution in the parks, but these emissions are harmful to humans, wildlife, aquatic species, vegetation and ultimately to park ecology.

The Draft Environmental Impact Statement is severely flawed and inadequate for the following reasons:

- 1) It fails to seriously consider a no-snowmobiling, no-trail grooming alternative.
- 2) It fails to analyze National Park Service statutes and regulations in regard to snowmobile use and fails to provide a winter use alternative that is consistent with these legal mandates.
- 3) It fails to comprehensively evaluate the impacts of snowmobile use on park wildlife (including threatened and endangered species), air and water quality, vegetation, serenity and solitude, ecology, park habitats (particularly fragile geothermal areas), and non-motorized users.
- 4) It provides too much emphasis on the economies of the gateway communities, even though the Park Service is not beholden to these interests.

Mr. Clifford Hawkes
November 17, 1999
Page Two

I strongly encourage you to abandon its alternatives and to adopt The Natural Regulation Alternative created by The Fund for Animals. This alternative prohibits snowmobiles, snowcoaches, and trail grooming in the parks, restricts road plowing, and promotes the development of an elevated monorail to permit future access to the parks while reducing the current environmental impacts.

The Natural Regulation Alternative is the only alternative that is consistent with federal law and provides true protection to the parks' wildlife and ecology. These parks are too important to permit their continued mismanagement and abuse.

Sincerely,

Alma Blackwelder

Alma Blackwelder

FORM LETTER 1

COMMENT:

I oppose the preferred alternative and the other alternatives offered in the DEIS. None of these alternatives provide the necessary protection of wildlife, ecology, air and water quality, or serenity and solitude in the parks.

RESPONSE:

The objection to the range of alternatives reflects a basic disagreement with the purpose and need for action and the scope of analysis. These determinations are discretionary for the National Park Service, as the agency responsible for performing the NEPA analysis. As indicated in the remainder of the response in this letter, the writer is predisposed to one alternative, that being the effective closure of the three park units during the winter. Since NEPA, agreed by court settlement with The Fund for Animals to write a comprehensive EIS for winter use in the parks, NEPA demands a range of alternatives that evaluate use beginning with current management and including both snowcoaches and snowmobiles. The letter writer accepts, without consideration of evidence or an appropriate finding, that motorized use of groomed routes in these three parks by definition adversely affects all the listed resources or values throughout the 3 units.

COMMENT:

For more than 30 years, the National Park Service (NPS) has permitted snowmobiling to adversely impact the parks' wildlife and ecology. The grooming of snowmobile trails has intensified the adverse impacts on wildlife, including threatened and endangered species. This is entirely inconsistent with NPS statutes, which require the NPS to preserve nature as it exists, and NPS regulations, which prohibit trail grooming and activities that disturb wildlife.

RESPONSE:

See foregoing response. NPS policies, supported by the 1990 winter closes for these parks, allow for motorized oversnow use. The issues related to this use have achieved urgency more due to the amount of use than the type of use itself. NPS regulations do not prohibit trail grooming or oversnow motorized use. However, they do require that snowmobile use (defined as an ORV) must be found to be consistent with park natural resources and values, safety considerations, et al, and must be limited to designated routes. Similarly, NPS statutes do not outright prohibit snowmobiles, nor do relevant executive orders. Parks that allow snowmobiles have limited them to designated routes. What has been lacking for some park units is an explicit finding, based on environmental analysis, of consistency with statutes, regulations and executive orders. It is the purpose of this EIS and the decision to be made in make that finding for the parks in question.

COMMENT:

Snowmobile use has impacted a number of park species, but none more so than Yellowstone bison. Bison use the groomed snowmobile trails as energy efficient travel routes, resulting in substantial impacts to population dynamics, and alterations to bison distribution, movement, and habitat use patterns. The groomed trails facilitate bison emigration from the park, where the majority of bison are captured, slaughtered, or gunned down by Montana state officials.

RESPONSE:

Impacts on wildlife are discussed in the DEIS. Some analyses have been expanded or supplemented with new information in the FEIS. Relative to bison and winter use, the scientific community is not in agreement about the impacts of groomed surfaces. The FEIS expounds on what is known as well as the points of disagreement. It is reasonably well accepted that bison do not generally use groomed surfaces to leave the park units. The fate of bison that do leave the park, mostly unrelated to winter recreation use, is the subject of a different EIS for bison management. Clearly, decisions resulting from the two EIS's need to be consistent where necessary.

COMMENT:

To make matters worse, snowmobiles are highly polluting. Not only are snowmobile emissions the principal source of air pollution in the parks, but these emissions are harmful to humans, wildlife, aquatic species, vegetation, and ultimately to park ecology.

FORM LETTER 1

RESPONSE:

The impacts of snowmobile and snowcoach emissions are disclosed in the FEIS. Subsequent to the publication of the DEIS, air quality modeling was undertaken in order to provide a more quantified estimate of impacts.

COMMENT:

The DEIS is severely flawed and inadequate for the following reasons: (1) It fails to seriously consider a no-snowmobiling, no-trail grooming alternative.

RESPONSE:

NPS disagrees that the DEIS is severely flawed. Such an alternative was considered but dismissed from detailed analysis for reasons discussed in both the DEIS (p. 38) and the FEIS. NPS mandates allow recreation use and enjoyment of the parks except when it is evident that resources and values are being harmed by that use. It is the judgement of the park service that some level of winter motorized use is necessary to meet this need and that measures can be developed to limit any impacts below the level of impairment. This judgement provided guidance for setting the scope of analysis and the range of alternatives considered. All alternatives allow for new management action if impairment is indicated. Two alternatives include adaptive management provisions to allow for management actions, including closures, as a means of determining specific resource impacts during plan implementation.

COMMENT:

(2) It fails to analyze NPS statutes and regulations in regard to snowmobile use and failed to provide a winter use alternative that is consistent with these legal mandates.

RESPONSE:

There is no need to analyze statutes and regulations, since they are not subject to change. The commenter is operating from the assumption that snowmobiling per se is illegal. See responses 1 and 2 above. NPS mandates are presented sufficiently in the DEIS and the FEIS to provide the basis for the purpose and need statement in C.

COMMENT:

(3) It fails to comprehensively evaluate the impacts of snowmobile use on park wildlife (including threatened and endangered species), air and water quality, vegetation, serenity and solitude, ecology, park habitats (particularly fragile geothermal areas), and non-motorized users.

RESPONSE:

The DEIS comprehensively evaluates the impacts of all alternatives on the listed resources and values. The EIS is intended to support a plan for winter use. The EIS and the Plan are programmatic in nature, and the scope of analysis is therefore less rigorous than would be necessary for a site-specific action. A plan is intended to guide future specific actions that may themselves require additional study within the broad parameters of the plan. Unless the commenter had an expectation of site-specific analysis, which is unnecessary, it is not clear upon what basis the DEIS is deemed to have failed.

COMMENT:

(4) It provides too much emphasis on the economies of the gateway communities, even though the NPS is not beholden to these interests.

RESPONSE:

The DEIS discloses social and economic impacts, as required by CEQ regulations. Information in the DEIS shows the cooperating agencies – states and counties – to be greatly concerned about the economies of gateway communities and not necessarily in agreement with NPS' need to take action. There is nothing to indicate that NPS is beholden to these interests. It is the park service's intent to protect park resources and allow the type and amount of use that is consistent with protection for enjoyment by future generations.

FORM LETTER 1

COMMENT:

I strongly encourage the NPS to abandon its alternatives and to adopt The Natural Regulation Alternative created by The Fund for Animals. This alternative prohibits snowmobiles, snowcoaches, and trail grooming in the parks, restricts road plowing, and promotes the development of an elevated monorail to permit future access to the parks while reducing the current environmental impacts. The Natural Regulation Alternative is the only alternative that is consistent with federal law and provides true protection to the parks' wildlife and ecology. These parks are too important to permit their continued mismanagement and abuse.

RESPONSE:

See foregoing responses. The Natural Regulation Alternative, outright closure of all 3 park units, has been dismissed as outside the scope and the purpose and need for action. The purpose and need includes effective access to the parks. Closing the parks does not meet the purpose and need. An elevated monorail system is deemed not to be fiscally possible at this time. Finally, if it is the commenter's opinion there is only one possible alternative consistent with relevant standards, it would not be practical to perform a comprehensive NEPA analysis as the Fund for Animals and NPS agreed to do in 1997. Having a single alternative approach to winter use, that being none, would be patently in violation of CEQ regulations.

Author: [REDACTED]
Date: 11/16/99 9:23 AM
Priority: Normal
TO: Clifford Hawkes at NP-DEN1
Subject: The Natural Regulation Alternative
November 16, 1999

Mr. Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

The NPS should adopt The Natural Regulation Alternative as its preferred winter use management plan for the Parks. This alternative bans snowmobiles, snowcoaches, and trail grooming in the Parks; minimizes road plowing; and promotes the development of an elevated monorail system to facilitate, but control, year round public use of the Parks while reducing the environmental impacts of such use.

The NPS must give full consideration to an alternative which would prohibit snowmobiles, snowcoaches, and trail grooming. Failure to do so violates the National Environmental Policy Act.

The continuation of snowmobiling in the Parks violates the NPS statutes and regulations which clearly prohibit public uses of the Parks which result in adverse impacts to wildlife, air and water quality, non-motorized recreationists, and Park ecology. With hundreds of thousands of acres of other federal land open to snowmobile use, there is no reason to permit snowmobiling in the Parks.

The Parks should set the standard for clean air, clean water, serenity, and solitude, they should not be playgrounds for pollution belching, loud machines which destroy air and water quality and shatter any semblance of serenity and solitude.

The NPS is not beholden to the economic needs of the Gateway communities (West Yellowstone, MT; Gardiner, MT; Cody, WY; Jackson, WY) and should not manage the Parks to protect the economies of these cities. The prohibition of snowmobiling and snowcoach use would not seriously impact the revenue of these cities and, indeed, could be a blessing by forcing them to diversify. If the NPS is going to consider the economic impacts of its proposed alternatives, then this must include an analysis of the economic costs of continuing to permit snowmobiles in the Parks including the cost of pollution, the killing of bison outside the Park, and the cost to the Park's ecology from continued degradation.

The DEIS failed to adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability of its beleaguered bison population, on predator/prey dynamics of coyotes and wolves, on critical but fragile thermally influenced habitat and vegetation, nor did it properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

Yellowstone, Grand Teton, and John D. Rockefeller Parkway are National Parks, not National Playgrounds.

Sincerely,

Jesse D. Saunders

FORM LETTER 2

COMMENT:

The NPS should adopt the Natural Regulation Alternative as its preferred winter use management plan for the Parks. This alternative bans snowmobiles, snowcoaches, and trail-grooming in the parks; minimizes road plowing; and promotes the development of an elevated monorail system to facilitate, but control, year round public use of the parks while reducing the environmental impacts of such use.

RESPONSE:

The Natural Regulation Alternative, outright closure of all 3 park units, has been dismissed as outside the scope and the purpose and need for action. The purpose and need includes effective access to the parks. Closing the parks does not meet the purpose and need. An elevated monorail system is deemed not to be fiscally possible at this time. See FEIS Chapter II, Alternatives Considered and Dismissed from Further Analysis.

COMMENT:

The NPS must give full consideration to an alternative which would prohibit snowmobiles, snowcoaches, and trail grooming. Failure to do so violates the National Environmental Policy Act.

RESPONSE:

The range of alternatives considered in the DEIS and the FEIS is sufficient under NEPA. Complete closure of the park units was considered and dismissed.

COMMENT:

The continuation of snowmobiling in the parks violates the NPS statutes and regulations which clearly prohibit public uses of the parks which result in adverse impacts to wildlife, air and water quality, nonmotorized recreationists, and park ecology. With hundreds of thousands of acres of other federal land open to snowmobile use, there is no reason to permit snowmobiling in the parks.

RESPONSE:

NPS policies, supported by the 1990 winter plans for these parks, allow for motorized oversnow use. The issues related to this use have achieved urgency more due to the amount of use than the type of use itself. NPS regulations do not prohibit trail grooming or oversnow motorized use. However, they do require that snowmobile use (defined as an ORV) must be found to be consistent with park natural resources and values, safety considerations, et al, and must be limited to designated routes. Similarly, NPS statutes do not outright prohibit snowmobiles, nor do relevant executive orders. Parks that allow snowmobiles have limited them to designated routes. What has been lacking for some park units is an explicit finding, based on environmental analysis, of consistency with statutes, regulations and executive orders. It is the purpose of this EIS, and the decision to result from it, to make that finding for the parks in question. Within the EIS are analyses of impacts from winter use on wildlife, air and water quality, other recreation uses (visitor experience), and a variety of resource elements that corporately relate to the parks as ecosystems. Finally, NPS is not evaluating winter use programs on other federal lands that may be available for snowmobiling; however, the EIS discloses what is known about the current and potential impacts of this use on other federal lands within the Greater Yellowstone Area.

COMMENT:

The parks should set the standard for clean air, clean water, serenity, and solitude. They should not be playgrounds for pollution belching, loud machines that destroy air and water quality and shatter any semblance of serenity and solitude.

RESPONSE:

See Chapter I, Purpose of and Need for the Proposed Action, and Appendix C in the FEIS. Relevant park service mandates, regulations and policies are cited, quoted and explained therein. All are reflected in the desired condition as explained in Chapter I.

FORM LETTER 2**COMMENT:**

The NPS is not beholden to the economic needs of the Gateway communities (West Yellowstone, MT; Gardiner, MT; Cody, WY; Jackson, WY) and should not manage the parks to protect the economies of these cities. The prohibition of snowmobiling and snowcoach use would not seriously impact the revenue of these cities and, indeed, could be a blessing by forcing them to diversify. If the NPS is going to consider the economic impacts of its proposed alternatives, then this must include an analysis of the economic costs of continuing to permit snowmobiles in the parks including the cost of pollution, the killing of bison outside the park, and the cost to the park's ecology from continued degradation.

RESPONSE:

The DEIS discloses social and economic impacts, as required by CEQ regulations. Information in the DEIS shows the cooperating agencies — states and counties — to be greatly concerned about the economies of gateway communities and not necessarily in agreement with NPS' need to take action. There is nothing to indicate that NPS is beholden to these interests. It is the Park Service's intent to protect park resources and allow the type and amount of use that is consistent with protection "for enjoyment by future generations."

COMMENT:

The DEIS failed to adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability on its beleaguered bison population, on predator/prey dynamics of coyotes and wolves, on critical but fragile thermally influenced habitat and vegetation, nor did it properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

RESPONSE:

The comment offers no evidence or examples of how or why the analysis in the DEIS "fails to adequately and comprehensively evaluate" these items. The DEIS, and the FEIS, comprehensively evaluate the impacts of all alternatives on the listed resources and values. The EIS is intended to support a plan for wider use. The EIS and the Plan are programmatic in nature, and the scope of analysis is therefore less rigorous than would be necessary for a site-specific action. A plan is intended to guide future specific actions that may themselves require additional study within the broad sideboards of the plan. Unless the commenter had an expectation of site-specific analysis, which is unnecessary, it is not clear upon what basis the DEIS' is deemed to have failed.

To: Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, Colorado 80228

November 5, 1999

Received
NOV 12 1999

DSC-RP

To the National Park Service,

I am writing your agency in response to the Winter Use Plan Draft Environmental Impact Statement (DEIS) throughout Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway.

First, I would like to thank all of the fine folks in the National Park Service who uphold and maintain the integrity of our wild lands heritage. I would also like to acknowledge the difficult and thankless position with which this decision must be made. Your efforts are not lost to those individuals such as myself that see our public resources such as the National Park System as a valuable bastion of biodiversity and scenic beauty.

At the outset I also want to acknowledge that I fully realize the economic importance that the areas in question provide those communities and individuals that depend on its continued access to winter sports (i.e. snow-mobiles, cross-country skiing etc.). I also realize that the trickle-down affect is an important economic consideration. However, one can not deny that certain winter activities within the areas in question raise critical issues regarding visitor safety, visitor enjoyment, pollution, and stress upon the natural features and wildlife within the Park. Therefore let me state that I fully support the

Citizens' Alternative

as proposed by the Greater Yellowstone Coalition, The Wilderness Society, etc. and unequivocally reject any of the proposed Alternatives as has been presented in the DEIS. Though the two general ideas (i.e., wild lands/wildlife preservation and economic opportunity) are not mutually exclusive, the problem herein lies in

how to accommodate the majority of the public, preserve the park, and still maintain a measure of economic benefit to those gateway communities that are directly effected by any such decision. Let us also recognize the economic axiom of Opportunity Cost. What is this opportunity cost? It is the cost of losing the natural beauty of a national treasure to short sighted greed while continuing to allow snowmobiles to use these parks as a play ground.

I have come to my decision for the following reasons:

- 1) Protecting the natural resources within the Parks **must** be the primary concern regarding this issue. Why did Congress establish Yellowstone as a national park in 1872? I do not feel that any of the Alternatives proposed by your agency fully protect the resources in question.
- 2) National parks are not amusement parks. According to Webster's dictionary, an amusement park is "an outdoor place with various devices for entertainment, as a merry-go-round, roller coaster, etc., refreshment booths, and the like". This definition can only apply to those areas outside of Yellowstone National Park etc. If those gateway communities want an amusement park then they should invest their own regional tax dollars in such projects if it is proper and appropriate within the Greater Yellowstone Ecosystem. The areas in question are not instruments for this type of development, nor should the National Park Service entertain any such ideas. Snowmobiles in this park system sounds more like an amusement park setting than our nations foremost national park. Snowmobiles can be and are used in the national forests surrounding the areas in question.
- 3) The Citizens' Alternative creates a transportation system that preserves the winter character of the parks. None of the proposed Alternatives seriously come to grips with the negative impacts that snowmobiles have in this premier winter landscape and wildlife haven.

- 4) *The Citizens' Alternative logically addresses the need for a comprehensive study to determine the winter use carrying capacity of the parks.*
- 5) *The Citizens' Alternative also limits the off-trail backcountry use by skiers and snowshoers where impacts to wildlife are considered serious.*
- 6) *The closure of the east entrance road is without question a necessity. Is the use of explosives in a national park even defensible?*

Recommendations/Observations:

- 1) *As stated in the Scoping Brochure for Winter Use Plans and by the NPS's own admission, winter use of the areas in question has increased dramatically over the last three decades. I strongly recommend that intensive studies are begun immediately to assess what effect this use is having on the native plants and animals within the entire GYE (i.e. noxious weeds, molested wildlife, damaged thermal features etc.). Subsequently, use this information to eventually put a cap on the number of winter visitors, that the areas in question can support without exhibiting measurable damage. It is certainly obvious that uncurtailed increases of winter visitors will have a substantial negative impact on the very reason many people visit these parks in the first place. Short term, careless, economic gain is not consistent with long term economic stability nor is it consistent with the principle's of establishing national parks. It is crucial that this information be of a scientific nature unmassaged by political agenda.*
- 2) *Initiate a phase out period by which all snowmobiles are completely phased out of the areas in question. An example would be a five year phase out period after which these machines will no longer be allowed within the areas in question and preferably throughout the entire National*

Park System. Those businesses that do earn a substantial income from the rental of these machines will thus have some time to transition to other investment opportunities. Isn't this just common sense?

- 3) *Close the inside park road in Grand Teton National Park to snowmobile use to allow for greater opportunity of non-motorized use of the Park. The general lack of non-motorized, unobtrusive use areas that are available for family outings or educational purposes is unacceptable.*
- 4) *Recently a controversy has been aired regarding the degree of air pollution from snowmobiles within Yellowstone National Park. This is a moot point. The fact that there is enough air pollution to even consider using Los Angeles as a benchmark should be a red flag to the National Park Service that something is seriously wrong. Those that belabor the precise or relative degree of air pollution as presented by the National Park Service are just trying to shroud the real issues in a veil of smoke. Should not the real issue be the banning of these machines to preserve the health and welfare of the park and its employees?*

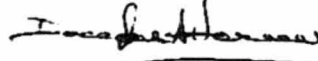
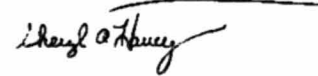
All of the recommendations and observations that have been presented represent a substantial amount of time and forethought regarding this issue. Again I realize that there could be certain economic consequences to a limited number of businesses and individuals; however, in the long run, the areas in question will continue to provide enjoyment for a more diverse public and also manage to retain its natural splendor. Should not this nation of capitalist ideals reward those entrepreneurs that can adapt to change? Let us not mortgage the future of this magnificent region that brings millions of dollars already into these gateway communities, by catering merely to one small special interest group. When and where do we as a nation draw the line? Why not here and now!

In conclusion, what the National Park Service decides regarding this matter will have far reaching effects for

generations. Do we want to preserve Yellowstone, Grand Teton, and John D. Rockefeller, Jr., Memorial Parkway as an amusement park, or as the Yellowstone Park Act originally intended, "a public park or pleasuring ground for the enjoyment of the people" which was to be preserved (the operative word here is preserve.) in its natural condition? I hope it is the latter! Please support the Citizens' Alternative.

Respectfully,

Douglas A. Harvey
Sheryl A. Harvey

FORM LETTER 3

COMMENT:

At the outset I also want to acknowledge that I fully realize the economic importance that the areas in question provide those communities and individuals that depend on its continued access to winter sports (i.e. snowmobiles, cross-country skiing etc.). I also realize that the trickle-down affect is an important economic consideration. However, one cannot deny that certain winter activities within the areas in question raise critical issues regarding visitor safety, visitor enjoyment, pollution, and stress upon the natural features and wildlife within the park.

RESPONSE:

The purpose and need for action written in Chapter I of both the DEIS and FEIS reflects these issues.

COMMENT:

Therefore let me state that I fully support The Citizens' Alternative as proposed by the Greater Yellowstone Coalition, The Wilderness Society, etc. and unequivocally reject any of the proposed alternatives as has been presented in the DEIS. Though the two general ideas (i.e., wild lands/wildlife preservation and economic opportunity) are not mutually exclusive, the problem herein lies in how to accommodate the majority of the public, preserve the park, and still maintain a measure of economic benefit to those gateway communities that are directly affected by any such decision. Let us also recognize the economic axiom of opportunity cost. What is this opportunity cost? It is the cost of losing the natural beauty of a national treasure to shortsighted greed while continuing to allow snowmobiles to use these parks as a playground.

RESPONSE:

"The Citizens' Solution" is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. "The Citizens' Solution" will not be considered specifically in the FEIS. Features that are expressed as part of "The Citizens' Solution" are for the most part considered throughout the range of DEIS alternatives (particularly alternative G) and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of "The Citizens' Solution" with EIS alternatives.

The expression of support for an alternative is of interest to the decision-maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

Protecting the natural resources within the parks must be the primary concern regarding this issue. Why did Congress establish Yellowstone as a national park in 1872? I do not feel that any of the alternatives proposed by your agency truly protect the resources in question.

RESPONSE:

The purpose and need for action is stated in accordance with relevant laws, regulations, executive orders and policies. See FEIS Chapter I and Appendix C. The range of alternatives is sufficient under NEPA to evaluate the issues and concerns related to winter recreation use. Protecting the parks from impacts that could result in impairment is a function of the decision to be made.

FORM LETTER 3

COMMENT:

National parks are not amusement parks. According to Webster's dictionary, an amusement park is "an outdoor place with various devices for entertainment, as a merry-go-round, roller coaster, etc., refreshment booths, and the like." This definition can only apply to those areas outside of Yellowstone National Park etc. If those gateway communities want an amusement park then they should invest their own regional tax dollars in such projects if it is proper and appropriate within the Greater Yellowstone Ecosystem. The areas in question are not instruments for this type of development, nor should the National Park Service entertain any such ideas. Snowmobiles in this park system sounds more like an amusement park setting than our nation's foremost national park. Snowmobiles can be and are used in the national forests surrounding the areas in question.

RESPONSE:

National parks were preserved in part for the enjoyment of present and future generations. To the extent that recreation use of various types can occur without degrading park resources and values, it is allowed. It is the function of the FIS to discuss the impacts of these uses as information for the decision maker.

COMMENT:

The Citizens' Alternative creates a transportation system that preserves the winter character of the parks. None of the proposed alternatives seriously come to grips with the negative impacts that snowmobiles have in this premier winter landscape and wildlife haven.

RESPONSE:

The Citizens' Alternative was apparently crafted without adequate review of the FIS. It is the result of the FIS does in FIS alternative C, providing access to the parks in the winter without mass transit only.

COMMENT:

The Citizen's Alternative logically addresses the need for a comprehensive study to determine the winter use carrying capacity of the parks.

RESPONSE:

Determination of a carrying capacity is a feature of all alternatives, as expressed in the FIS and the FIS. Methods and Assumptions Commission to All Alternatives.

COMMENT:

The Citizen's Alternative also limits the off-trail backcountry use by skiers and snowshoers where impacts to wildlife are considered serious.

RESPONSE:

FIS alternatives B and F limit backcountry use. FIS alternatives E, F and G do not.

COMMENT:

As stated in the scoping brochure for Winter Use Plans and by the Park Service's own admission, winter use of the areas in question has increased dramatically over the last three decades. I strongly recommend that intensive studies are begun immediately to assess what effect this use is having on the native plants and animals within the entire GYE (i.e. noxious weeds, molested wildlife, damaged thermal features, etc.). Subsequently, use this information to eventually put a cap on the number of winter visitors, that the areas in question can support without exhibiting measurable damage. It is certainly obvious that uncurtailed increases of winter visitors will have a substantial negative impact on the very reason many people visit these parks in the first place. Short-term, careless, economic gain is not consistent with long-term economic stability nor is it consistent with the principles of establishing national parks. It is crucial that this information be of a scientific nature unmassaged by political agenda.

RESPONSE:

This is the function of the FIS, as set in scoping brochure terms.

FORM LETTER 3

COMMENT:

Initiate a phase out period by which all snowmobiles are completely phased out of the areas in question. An example would be a five-year phase out period after which these machines will no longer be allowed within the areas in question and preferably throughout the entire National Park System. Those businesses that do earn a substantial income from the rental of these machines will thus have some time to transition to other investment opportunities. Isn't this just common sense?

RESPONSE:

The Park Service's preferred alternative in the FEIS, alternative C, would eliminate snowmobiles after two winter seasons. Regardless of the final selected alternative, some attention will be given to the timing of implementation in the decision document (Record of Decision) to be issued. Some features of the plan may be implemented earlier, and some later. Consideration must be given to the businesses with which the parks have contractual obligations, and it is recognized that some measures will not be implemented until new concession contracts are awarded.

COMMENT:

Close the inside park road in Grand Teton National Park to snowmobile use to allow for greater opportunity of nonmotorized use of the park. The general lack of nonmotorized, unobtrusive use areas that are available for family outings or educational purposes is unacceptable.

RESPONSE:

Most of the alternatives considered have incorporated this feature. Alternative C is the only "action" alternative that doesn't.

COMMENT:

Recently a controversy has been aired regarding the degree of air pollution from snowmobiles within Yellowstone National Park. This a moot point. The fact that there is enough air pollution to even consider using Los Angeles as a benchmark should be a red flag to the National Park Service that something is seriously wrong. Those that belabor the precise or relative degree of air pollution as presented by the National Park Service are just trying to shroud the real issues in a value of smoke. Should not the real issue be the banning of these machines to preserve the health and welfare of the park and its employees?

RESPONSE:

Air quality and health impacts are discussed in the FEIS.

Author: [REDACTED]
Date: 11/24/99 4:17 PM
TO: YELL Winter Use at NP-YELL
Subject: Support the Citizens Solution
----- Message Contents

Dear Clifford Hawkes,

>
>
>I support The Citizens' Solution for Winter Access to
>Yellowstone, which will protect the natural values of the parks
>while providing park visitors with safe, efficient and affordable
>access.
>
>I ask that the Park Service adopt The Citizens' Solution, which
>will:
>
>* Restore natural sounds and clean air by phasing out snowmobiles
>in Yellowstone and Grand Teton;
>
>* Institute a group travel system in Yellowstone using snowcoaches
>only;
>
>* Discontinue the Continental Divide Snowmobile Trail in Grand
>Teton;
>
>* Stop the expensive and unnecessary use of military explosives in
>Yellowstone by closing the east entrance in winter.
>
>I again urge you to adopt The Citizens' Solution.
>

jeff maurer
104 king george cr
charlottesville, Virginia 22901

COMMENT:

I support the Citizens' Solution for Winter Access to Yellowstone, which will protect the natural values of the parks while providing park visitors with safe, efficient and affordable access.

The Citizens' Solution is the only alternative considered specifically in the EIS. Many people who commented did not like the "mix" of features in the EIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the obligation to select a different "mix" of features in the final decision so long as the effects do not differ in any substantial manner. The Citizens' Solution will not be developed specifically in the EIS. Features that were proposed as part of "The Citizens' Solution" are for the most part included throughout the range of EIS alternatives (see alternative C) and are available for consideration in the final decision. See the section "Alternatives for Review during the Public Comment Period" located in Chapter II of the EIS, which presents a comparison of "The Citizens' Solution" with EIS alternatives.

The expression of support for an alternative is of interest to the agency in order to make a final decision. The final decision will be developed following the publication of a Final EIS. Expressions of support carry no information that by themselves would be cause for any change in the EIS. The range of alternatives considered in the EIS remains the same.

COMMENT:

I ask that the Park Service adopt the Citizens' Solution, which will: restore natural sounds and clean air by phasing out snowmobiles in Yellowstone and Grand Teton; institute a group travel system in Yellowstone using snowcoaches only; discontinue the Continental Divide Snowmobile Trail in Grand Teton; stop the expensive and unnecessary use of military explosives in Yellowstone by closing the east entrance in winter.

This comment requests that a certain decision be made. In fact, it pertains only to the method of decision and not to the EIS or any analysis of the range of alternatives considered therein. As stated above, all the features listed here in the letter are included in one or more alternatives in the EIS and FHS. The first 3 bullet points are all part of EIS alternative C, as well as other alternatives in the final decision alternative C. The 4th bullet point is not part of the EIS or FHS, and has no connection to any alternative features such as those described. Therefore, it is necessary to separate the 4th bullet point as a separate alternative in the EIS.

Author: [REDACTED]
Date: 11/03/1999 8:40 AM
Priority: Normal
TO: YELL Winter Use at NP-YELL
CC: seanasmith@earthisland.org at NP--INTERMOUNT
Subject: Protect Yellowstone and Grand Teton from snowmobiles!

Clifford Hawkes
NPS - Denver Service Center
11795 West Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

I strongly support the National Park Service (NPS) and its long and successful history in protecting America's national heritage. However, I'm concerned that the NPS draft Winter Use Plan/Environmental Impact Statement for Yellowstone and Grand Teton National Parks fails to leave park resources "unimpaired" for future generations. In particular, I am deeply disappointed that the NPS preferred alternative fails to prohibit recreational snowmobile activity. Therefore, I urge the NPS to adopt the Citizen's Solution for Winter Access to Yellowstone and Grand Teton National Parks which will:

1. Restore natural sounds and clear air by phasing out snowmobiles in Yellowstone and Grand Teton.
2. Institute a group travel system in Yellowstone using snowcoaches only.
3. Discontinue the Continental Divide Snowmobile Trail in Grand Teton.

Compromise solutions such as plowing the park road from Yellowstone's west entrance to Old Faithful will not prevent snowmobiles from damaging park resources. They will merely push snowmobile activity/damage to other parts of the greater Yellowstone area, such as Grand Teton National Park (GTNP), the John D. Rockefeller Memorial Parkway (JDRP) and Yellowstone's (YNP) southern acreage.

Federal law such as the Organic Act, the Endangered Species Act, and the Clean Air Act, as well as court cases (i.e. SUWA vs. Dahnay) and executive orders 11644 and 11989 direct the NPS to prohibit any recreational activity that causes lasting damage to park resources and wildlife.

I believe the Citizen's Solution best protects the natural values of the parks while providing park visitors with safe, efficient and affordable access. I again urge you to adopt the Citizen's Solution.

Sincerely,

Arndt Husar
1413 N Campbell #2
Chicago, IL 60622

Center for Neighborhood Technology
Arndt Husar
1413 N Campbell #2
Chicago, IL 60622

[REDACTED]

COMMENT:

I strongly support the National Park Service (NPS) and its long and successful history in protecting America's national heritage. However, I'm concerned that the NPS draft Winter Use Plan/Environmental Impact Statement for Yellowstone and Grand Teton National Parks fails to leave park resources "unimpaired" for future generations. In particular, I am deeply disappointed that the NPS preferred alternative fails to prohibit recreational snowmobile activity. Therefore, I urge the NPS to adopt The Citizen's Solution for winter access to Yellowstone and Grand Teton National Parks.

COMMENT:

Restore natural sounds and clear air by phasing out snowmobiles in Yellowstone and Grand Teton. Institute a group travel system in Yellowstone using snowcoaches only.

COMMENT:

Discontinue the Continental Divide Snowmobile Trail in Grand Teton.

COMMENT:

Compromise solutions such as plowing the park road from Yellowstone's West Entrance to Old Faithful will not prevent snowmobiles from damaging park resources. They will merely push snowmobile activity/damage to other parts of the greater Yellowstone area, such as Grand Teton National Park (GTNP), the John D. Rockefeller Memorial Parkway (JDR) and Yellowstone's (YNP) southern acreage.

FORM LETTER 5**RESPONSE:**

As stated, all alternatives in the EIS were formulated for various reasons – in addressing issues or management needs. All alternatives would have consequences of one sort or another, as documented in Chapter IV of the EIS. Alternative B would eliminate access via snowmobiles where the greatest amount of snowmobile use presently exists, and where the largest set of impacts presently occurs. As an alternative, this meets the purpose and need for action to a degree. As to what might happen in terms of visitation in response to such an alternative, this is speculation. However, visitor use scenarios and recreation use displacement is addressed in the FEIS under visitor access and circulation, and impacts on adjacent lands.

COMMENT:

Federal law such as the Organic Act, the Endangered Species Act, and the Clean Air Act, as well as court cases (i.e. SUWA vs. Dabney) and executive order 11644 and 11989 direct the NPS to prohibit any recreational activity that causes lasting damage to park resources and wildlife.

RESPONSE:

The purpose and need for action is stated in accordance with relevant laws, regulations, executive orders and policies. See FEIS Chapter I and Appendix C. The range of alternatives is sufficient under NEPA to evaluate the issues and concerns related to winter recreation use. Protecting the parks from impacts that could result in impairment is a function of the decision to be made.

Author: [REDACTED]
Date: 9/2/98 10:19 PM
Normal
TO: YELL Winter Use at NP-YELL
CC: seanmitch@earthlink.net at NP--INTERNET
Subject: Protect Yellowstone and Grand Teton from Snowmobiles!
----- Message Contents

Clifford Hawkes
NPS - Denver Service Center
11795 West Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

I have visited Yellowstone National Park on a number of occasions, and have enjoyed watching wildlife there. I am, however, deeply disturbed by the huge increase in snowmobile use in the Park and its effect on air quality, wildlife, and the park experience for non-motorized users.

I strongly support the National Park Service (NPS) and its long and successful history in protecting America's national heritage. However, I'm concerned that the NPS draft Winter Use Plan/Environmental Impact Statement for Yellowstone and Grand Teton National Parks fails to leave park resources "unimpaired" for future generations. In particular, I am deeply disappointed that the NPS preferred alternative fails to prohibit recreational snowmobile activity.

Snowmobiles cause damage to park resources, air and water quality, area wildlife, public safety and health, and visitor enjoyment. It is estimated that the dirty two-stroke engines of the 80,000 snowmobiles that enter YNP dump over 100,000 gallons of unburned gas, and more than 2,000 gallons of raw oil into the park's environment. This is unacceptable.

Compromise solutions such as plowing the park road from Yellowstone's west entrance to Old Faithful will not prevent snowmobiles from damaging park resources. They will merely push snowmobile activity/damage to other parts of the greater Yellowstone area, such as Grand Teton National Park (GTNP), the John D. Rockefeller Memorial Parkway (JDR) and Yellowstone's (YNP) southern acreage.

Federal law such as the Organic Act, the Endangered Species Act, and the Clean Air Act, as well as court cases (i.e. *SUNIA vs. Dabney*) and executive orders 11644 and 11989 direct the NPS to prohibit any recreational activity that causes lasting damage to park resources and wildlife. Therefore, I strongly support amending the preferred alternative to include a total prohibition on snowmobile activity throughout YNP and GTNP and the JDR.

Sincerely,

-
Ted Zukoski
1105 Ithaca Drive
Boulder, CO 80303
[REDACTED]

FORM LETTER 6

COMMENT:

I have visited Yellowstone National Park on a number of occasions, and have enjoyed watching wildlife there. I am, however, deeply disturbed by the huge increase in snowmobile use in the park and its effect on air quality, wildlife, and the park experience for nonmotorized users.

RESPONSE:

Such concerns are the basis for the purpose and need for action documented in the EIS. See Chapter I in the FEIS, especially the discussion of desired condition versus existing condition.

COMMENT:

I strongly support the National Park Service (NPS) and its long and successful history in protecting America's national heritage. However, I'm concerned that the NPS draft Winter Use Plan/Environmental Impact Statement for Yellowstone and Grand Teton National Parks fails to leave park resources "unimpaired" for future generations. In particular, I am deeply disappointed that the NPS preferred alternative fails to prohibit recreational snowmobile activity.

RESPONSE:

The adequacy of an environmental impact statement is not indicated by the preference of a specific alternative. Further, an EIS does not, by itself, take any kind of action. The action is taken when a decision is made and implemented. The EIS contains a range of alternatives sufficient to address the purpose and need for action and the issues brought up through public scoping efforts, and sufficient to provide choices for the decision maker. The FEIS preferred alternative is different than that expressed in the DEIS, and it would eliminate snowmobile use.

COMMENT:

Snowmobiles cause damage to park resources, air and water quality, area wildlife, public safety and health, and visitor enjoyment. It is estimated that the dirty two-stroke engines of the 60,000 snowmobiles that enter YNP dump over 100,000 gallons of unburned gas, and more than 2,000 gallons of raw oil into the park's environment. This is unacceptable.

RESPONSE:

The EIS discloses the current and potential impacts of winter recreation use on a number of resources, including those listed in the comment.

COMMENT:

Compromise solutions such as plowing the park road from Yellowstone's West Entrance to Old Faithful will not prevent snowmobiles from damaging park resources. They will merely push snowmobile activity/damage to other parts of the greater Yellowstone area, such as Grand Teton National Park (GTNP), the John D. Rockefeller Memorial Parkway (JDR) and Yellowstone's (YNP) southern acreage.

RESPONSE:

As stated, all alternatives in the EIS were formulated for various reasons - in addressing issues or management needs. All alternatives would have consequences of one sort or another, as documented in Chapter IV of the EIS. Alternative II would eliminate access via snowmobiles where the greatest amount of snowmobile use presently exists, and where the largest set of impacts presently occurs. As an alternative, this meets the purpose and need for action to a degree. As to what might happen in terms of violation in response to such an alternative, this is speculation. However, visitor use standards and recreation use management is addressed in the FEIS under visitor access and circulation, and impacts on adjacent lands.

FORM LETTER 6

COMMENT:

Federal law such as the Organic Act, the Endangered Species Act, and the Clean Air Act, as well as court cases (i.e. SUWA vs. Dabney) and executive order 11644 and 11989 direct the NPS to prohibit any recreational activity that causes lasting damage to park resources and wildlife. Therefore, I strongly support amending the preferred alternative to include a total prohibition on snowmobile activity throughout YNP and GTNP and the JDR.

RESPONSE:

The purpose and need for action is stated in accordance with relevant laws, regulations, executive orders and policies. See FEIS Chapter I and Appendix C. The range of alternatives is sufficient under NEPA to evaluate the issues and concerns related to winter recreation use. Protecting the parks from impacts that could result in impairment is a function of the decision to be made.

Author: Christopher M Robinson [REDACTED]
Date: 11/23/99 1:14 PM
TO: YELL Winter Use at WP-YELL
Subject: Adopt the "Citizens Solution!"

----- Message Contents

Dear Mr. Hawkes

Please support adoption of the Citizens Solution for Yellowstone National Park which requires the following:

Substitution of access by snowcoach for the 67,000 snowmobile trips that spoiled Yellowstone's clean air and natural sounds last winter, and overwhelmed road systems in both parks.

Requires a study to determine the winter carrying capacity of the parks. With more information, the Park Service can strike a better balance between protection of park resources and a quality visitor experience.

Encourages further research on the needs of wildlife wintering in Yellowstone and Grand Teton.

Limits off-trail backcountry use by skiers and snowshoers where wildlife need additional protection.

Discontinues the Continental Divide Snowmobile Trail in Grand Teton National Park while continuing automobile access in the park.

Closes Yellowstone's east entrance road, where only 3 percent of park visitors travel and where expensive avalanche control efforts involve military explosives that are not in keeping with the purpose of national parks.

Thank you for your time and consideration,

Chris Robinson

FORM LETTER 7

COMMENT:

Please support adoption of the Citizens Solution for Yellowstone National Park.

"The Citizens' Solution" is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternative. These alternatives were formulated in response to request, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. "The Citizens' Solution" will not be considered specifically in the FEIS. Features that are incorporated as part of "The Citizens' Solution" are for the most part considered throughout the range of DEIS alternatives (particularly alternative C) and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter 6 of the FEIS, which presents a comparison of "The Citizens' Solution" with FEIS alternatives.

The submission of requests for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the final FEIS. Submitters of requests convey no information that by themselves would be cause for any alterations to the FEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

Substitute access by snowcoach for the 67,000 snowmobile trips that spoiled Yellowstone's clean air and natural sounds last winter, and overwhelmed road systems in both parks.

"The Citizens' Solution" is not an alternative considered specifically in the DEIS. It contains many of the features in DEIS alternative C, including access to the backcountry snowcoach and snowmobiling.

COMMENT:

Require a study to determine the winter carrying capacity of the parks. With more information, the Park Service can strike a better balance between protection of park resources and a quality visitor experience.

Carrying capacity of a wintering capacity is a feature of all alternatives, as expressed in the DEIS and the FEIS. Action and Assumptions Common to All Alternatives.

COMMENT:

Encourage further research on the needs of wildlife wintering in Yellowstone and Grand Teton.

Additional research requires a level of monitoring necessary to implement the actions outlined within the plan. Some alternatives, notably B, E and G would involve more intensive management provisions over and above routine monitoring. See Chapter 6 and Appendix I in the FEIS in which some detail is provided for monitoring and wildlife management. Further research needs are also identified in FEIS Chapter 6.

COMMENT:

Limit off-trail backcountry use by skiers and snowshoers where wildlife need additional protection.

Off-trail backcountry use is a feature of all alternatives, as expressed in the DEIS and the FEIS. Action and Assumptions Common to All Alternatives.

COMMENT:

Discontinue the Continental Divide Snowmobile Trail in Grand Teton National Park.

COMMENT:

Close Yellowstone's east entrance road, where only 3% of park visitors travel and where expensive avalanche control efforts involve military explosives that are not complimentary with the purpose of national parks.

Author: marcraill [REDACTED] at np--internet

Date: 12/8/99 2:25 AM

TO: YELL Winter Use at NP-YELL

Subject: Support the Citizens Solution

----- Message Contents

Received: from sn2.aredigita.com ([209.67.226.134]) by cemail.ltd.nps.gov with SMTP

(IDM Internet Exchange 3.13) id 0002C71E; Tue, 7 Dec 1999 21:24:35 -0500

Received: (qmail 13410 invoked from network); 8 Dec 1999 02:25:12 -0000

Received: from localhost (HELO AOLserver?sn2) (127.0.0.1)

by localhost with SMTP; 8 Dec 1999 02:25:12 -0000

To: yell_winter_use@nps.gov

From: marcraill [REDACTED]

Subject: Support the Citizens Solution

Date: Wed, 08 Dec 1999 02:25:12 GMT

FORM LETTER 8

COMMENT:

I support adoption of the Citizens Solution for Yellowstone National Park.

RESPONSE:

"The Citizens' Solution" is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. "The Citizens' Solution" will not be considered specifically in the FEIS. Features that are expressed as part of "The Citizens' Solution" are for the most part considered throughout the range of DEIS alternatives (particularly alternative G) and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of "The Citizens' Solution" with EIS alternatives.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

Winter Use Plan
National Park Service
12795 West Alameda Parkway
Lakewood, CO 80228
Attention: Clifford Hawkes

Dear Mr. Hawkes:

I wish to comment on the Draft Winter Visitor Use Plan and Draft Environmental Impact Statement (DEIS) for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr. Memorial Parkway. I support snowmobiling in the Parks. I support a modification of Alternative E that will:

- * Apply adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the Parks.

- * Protect the Grand Loop snowmobiling experience, with snowmobile access from all current entrances. Maintain the Continental Divide Snowmobile Trail.

- * Reasonably regulate snowmobiles for emissions and sound. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed.

- * Provide non-motorized opportunities and trails away from main motorized routes.

I oppose the preferred Alternative B that would plow the road from West Yellowstone to Old Faithful. The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

National Parks are established for the use and enjoyment of people. While the Park's resources must be protected for the future, today's special winter visitor experience must also be protected. Touring Yellowstone by snowmobile combines the grandeur of the Park's unique features with the freedom to experience it directly. The Winter Visitor Use Plan must protect this experience.

Thank you for considering my comments. Please put my name on your mailing list so I can be kept informed on this issue.

Sincerely,

Signature

David C F Dobb

Print Name

Po Box 255

Street

Bozorth, WA 98041

City, State, Zip

FORM LETTER 9

COMMENT:

I support snowmobiling in the Parks. I support a modification of Alternative E that will:

- Apply adaptive planning that uses information as it is developed to responsibly manage winter recreation in the Parks.
- Protect the Grand Loop snowmobiling experience, with snowmobile access from all current entrances. Maintain the Continental Divide Snowmobile Trail.
- Reasonably regulate snowmobiles for emissions and sound. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed.
- Provide non-motorized opportunities and trails away from main motorized routes.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The listed features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

I oppose the preferred Alternative B that would plow the road from West Yellowstone to Old Faithful.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision.

COMMENT:

The DEIS has not accurately or sufficiently considered the impact of alternative B on surrounding communities, wildlife, and visitor expectation and experience, wildlife, and the resource.

RESPONSE:

The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. It is the Park Service's impression that what is meant by the comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision.

FORM LETTER 9

maker. Since the preferred alternative changes in the FEIS, the discussion of alternative B as preferred is academic.

COMMENT:

National Parks have been established for the use and enjoyment of people. While the Park's resources must be protected for the future, today's special winter visitor experience must also be protected. Touring Yellowstone by snowmobile combines the grandeur of the Park's unique features with the freedom to experience it directly. The Winter Visitor Use Plan must protect this experience.

RESPONSE:

NPS points out that a great number of taxpayers commented on the DEIS. Many strongly objected to the presence of snowmobiles. NPS is committed to finding the appropriate level and type of winter use - that level which assures protection of resources for enjoyment by future generations. In a nutshell, this represents the purpose and need for action - it frames the analysis in the EIS.

COMMENTS

Winter Use Plan

National Park Service
12795 West Alameda Parkway
Lakewood, Co. 80228

Attention: Clifford Hawkes

Dear Mr. Hawkes:

I wish to comment on the Draft Winter Visitor Use Plan and Draft Environmental Impact Statement (DEIS) for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr. Memorial Parkway. I support snowmobiling in the Parks. I support a modification of alternative E that will:

- apply adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the Parks.
- Protect the Grand Loop snowmobiling experience, with snowmobile access from all current entrances. Maintain the Continental Divide Snowmobile Trail.
- Reasonably regulate snowmobiles for emissions and sound. I support the EPA's process in regulating emissions and feel the National Park Service should follow such guidelines as they are developed.
- Provide non-motorized opportunities and trails away from main motorized routes.

I strongly oppose Alternative B that would plow the road from West Yellowstone to Old Faithful. The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife and other resources.

Thank you for considering my comments. Please add my name to the mailing list for this issue.

Sincerely,

Andrew Rucklshaus (Andrew Weas)

13216 Phavenue

GT Falls mt. 59404

FORM LETTER 19

COMMENT:

I support a modification of alternative E.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were developed to respond to feedback that the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were not closely analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with DEIS alternatives.

The features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

I support a modification of alternative E that will apply adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the parks.

RESPONSE:

Adaptive management is a feature of alternatives B, E and G in the FEIS. These are choices for the decision maker.

COMMENT:

I support a modification of alternative E that will protect the Grand Loop snowmobiling experience, with snowmobile access from all current entrances. Maintain the Continental Divide Snowmobile Trail.

RESPONSE:

The Grand Loop experience would be provided under alternatives A and E. The CDST would be maintained in alternatives A, B, C and D. These are choices for the decision maker.

COMMENT:

I support a modification of Alternative E that will reasonably regulate snowmobiles for emissions and sound. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed.

RESPONSE:

The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports NPS' need to implement a plan that is consistent with the Park Service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units.

FORM LETTER 10**COMMENT:**

I support a modification of alternative E that will provide nonmotorized opportunities and trails away from main motorized routes.

RESPONSE:

All alternatives accommodate a separation between nonmotorized trails and motorized routes to a greater or lesser degree. Motorized sound is still evident along much of the nonmotorized trail system. This is an issue for people who engage in nonmotorized activities, with an expectation of solitude and enjoyment of the natural soundscape.

COMMENT:

I oppose the preferred alternative B that would plow the road from West Yellowstone to Old Faithful. The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision. The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate. It is NPS' impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker.

November 10, 1999

NOV 15 1999

Winter use Plan

DSC-PM

National Park Service
12795 West Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes,

I would like to express my opinion of The Draft Winter Visitor Use Plan and the Draft Environmental Impact Statement (DEIS) for the Yellowstone and the Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Parkway. As an avid snowmobiler I support snowmobiling in our national parks.

I am completely opposed to your preferred Alternative B, as it appears this alternative's goal is to eliminate snowmobiling in Yellowstone, Grand Teton and the Memorial Parkway. The same holds true for all the other alternatives also.

However, I do support a modified Alternative B. Those modifications are as follows:

1. Apply planning that adapts and uses new information as it develops to manage winter recreation responsibly in the Parks.
2. Protect the Grand Loop snowmobiling experience. Maintain access from all of the present entrances. And also maintain the Continental Divide Snowmobile Trail.
3. Regulate the emissions and noise level of snowmobiles reasonably. Let the Environmental Protection Agency regulate this, not the Forest Service. The NPS should follow the EPA's guidelines as they are developed. Would it make sense for the EPA to manage our national parks?
4. Separate non-motorized areas and trails from motorized areas in order to provide a winter experience for all to enjoy.
5. I am against your Alternative B. This would allow for plowing of the road from West Yellowstone to Old Faithful. Your DEIS has not allowed for the impact of "B" on wildlife, the towns close by, visitors, and the whole area.
6. Our National Parks and Forests were created for the American people to enjoy, not to be locked up and closed. We need to protect these wonders of nature for future generations, and we need to protect our present access to them. The freedom to ride a snowmobile and get close in to see the grandeur of Yellowstone must be taken into account when your Winter Visitor Use Plan is completed.
7. Thank you for taking my concerns into account. I would like you to put my name on your mailing list so as to be kept informed on this matter.

Sincerely,

Kris Muniz
7764 Fiske Street

FORM LETTER 11**COMMENT:**

I am completely opposed to your preferred alternative B, as it appears this alternative's goal is to eliminate snowmobiling in Yellowstone, Grand Teton and the Parkway. The same holds true for all the other alternatives also.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. See response to commenter's point 5, below. The reader should note that the alternatives are exactly what they say: in alternative B, snowmobiling would be eliminated from West Yellowstone to Old Faithful but not elsewhere in Yellowstone. Only one alternative in seven eliminates snowmobiles entirely from the three park units, alternative G.

COMMENT:

I do support a modified alternative E.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

1) Apply planning that adapts and uses new information as it develops to manage winter recreation responsibly in the parks.

RESPONSE:

Adaptive management is a feature of alternatives B, E and G in the FEIS. These are choices for the decision maker.

COMMENT:

2) Protect the Grand Loop experience. Maintain access from all of the present entrances. And also maintain the Continental Divide Snowmobile Trail.

RESPONSE:

The Grand Loop experience would be provided under alternatives A and E. The CDST would be maintained in alternatives A, B, C and D. These are choices for the decision maker.

FORM LETTER 11**COMMENT:**

3) Regulate the emissions and noise of snowmobiles reasonably. Let the Environmental Protection Agency regulate this, not the Park Service. The NPS should follow the EPA's guidelines as they are developed. Would it make sense for the EPA to manage our national parks?

RESPONSE:

The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports NPS' need to implement a plan that is consistent with the park service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units.

COMMENT:

4) Separate nonmotorized areas and trails from motorized areas in order to provide a winter experience for all to enjoy.

RESPONSE:

All alternatives accommodate a separation between nonmotorized trails and motorized routes to a greater or lesser degree. Motorized sound is still evident along much of the nonmotorized trail system. This is an issue for people who engage in nonmotorized activities, with an expectation of solitude and enjoyment of the natural soundscape.

COMMENT:

5) I am against your alternative B. This would allow for plowing of the road from West Yellowstone to Old Faithful. Your DEIS has not allowed for the impact of "B" on wildlife, the towns close by, visitors, and the whole area.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision. The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate. It is the park service's impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker.

COMMENT:

Our National Parks and Forests were created for the American people to enjoy, not to be locked up and closed. We need to protect these wonders of nature for future generations, and we need to protect our present access to them. The freedom to ride a snowmobile and get close in to see the grandeur of Yellowstone must be taken into account when your Winter Visitor Use Plan is completed.

RESPONSE:

The effects of snowmobiling in the parks is evaluated in six alternatives that allow that use, in varying locations. The decision maker will weigh the snowmobiling recreation experience, which is enjoyed by many people, against the impacts it causes. There are no alternatives considered in this EIS that would close the parks to winter access. Alternative G changes the mode of transport, but access would still be available.

November 13, 1999

Mr. Clifford Hawkes
Winter Use Plan
12795 W. Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

I have become aware of the Draft Environmental Impact Statement for Yellowstone and Grand Teton National Park and would like to comment. I am very disappointed to see that your preferred Alternative B--would completely change winter visits to the "People's Park". I oppose Alternative B.

According to your own study, only 4% of the visitors supported plowing the road from West Yellowstone to Old Faithful without a parallel snowmobile route being provided. You also estimate that plowing this road will result in a \$12.4 Million decrease in visitor spending.

Please explain why you would support such a drastic cut in visitors and in economic impact....I always thought that was the People's Park.

I support Revised Alternative E which is much more reasonable and logical and include:

- * A commitment to develop acceptable measures for mitigating impacts.
- * Selling only bio-based fuels. Considering these fuels are now available and are now being used by many, only those fuels should be sold after the 2001 season.
- * Enforce the posted speed limit. Close the Park from 10 pm to 6 am daily.
- * Provide additional warming huts where facilities do not currently exist. This would encourage visitors to disperse throughout the Park instead of at Old Faithful.
- * Require all West Gate entrance passes be pre-purchased. Pre-paid passes should also be promoted at the other gates as well.

Unfortunately, I do not believe that Alternative B is based on good science and does not sufficiently consider the impacts of this alternative on the visitor experience, the wildlife, and the resources.

Please consider my comments. I would like to be added to your mailing list for all future Yellowstone National Park plans. Thank you.

Sincerely,

Bill Bush
903 W 5th St
Lakewood, CO 80228

FORM LETTER 12

COMMENT:

I oppose alternative B.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

Please explain why you would support such a drastic cut in visitors and in economic impact...I always thought that Yellowstone National Park was the People's Park.

RESPONSE:

NPS does not agree that there would be a drastic cut in visitors and in economic impact. The difference is in how people access the park from West Yellowstone; access is not closed off from that entrance or any other in this alternative. The rationale for designating alternative B as the preferred alternative in the Draft EIS is shown on pages 32-39 of that document. The discussion of alternative B as the preferred alternative is academic in that the preferred alternative changes in the Final EIS. It could be stated that NPS responded to the majority of people who focused their comments on objecting to preferred alternative B by changing its preference to another alternative.

COMMENT:

I support Revised Alternative E which, in my opinion, is much more reasonable.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision.

The expression of support for an alternative is of interest to the decision-maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

Please consider the following which are included in the Revised Alternative E:

- A commitment to develop acceptable measures for mitigating impacts.
- Selling only Bio-Based fuels. Considering these fuels are now available they should be utilized immediately with only those fuels being sold after the 2001 season.
- Enforce the posted speed limit. Close the Park from 10 pm to 6 am daily.
- Provide additional warming huts where facilities do not currently exist. This would encourage visitors to disperse throughout the Park instead of at Old Faithful.
- Require all West Gate entrance passes be pre-purchased. Pre-paid passes should also be promoted at all other gates as well.

FORM LETTER 12**RESPONSE:**

These features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

COMMENT:

Unfortunately, I do not believe that alternative B is based on good science and does not sufficiently consider the impacts of this alternative on the visitor experience, the wildlife, and the resources.

RESPONSE:

The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate. An EIS is not, per se, a scientific document. CEQ regulations (40 CFR §1502.22) allow the use of the best available information and techniques to support an analysis where data is incomplete or unavailable. It is the Park Service's impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker.

Clifford Hawkes
National Park Service
12795 W. Alameda Parkway
Lakewood, CO 80228

Receiver
NOV 02 1999

DSC-RP

Enclosed is my thoughtful evaluation and public comment in reference to the Environmental Impact Statement for the Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr., Memorial Parkway.

I object to "Alternative B" due to the following reasons:

1. According to a recent NPS survey nearly 70% of Yellowstone's winter visitors supported continued snowmobile access via West Yellowstone. In that same survey, only 4% supported the plowing of roads without a parallel trail for snowmobile use.
2. Alternative B would plow the road between West Yellowstone and Old Faithful which will create a missing link in the Grand Loop for snowmobilers, which would,
 - make it difficult to reach Old Faithful from the north and east, and totally eliminate access to West Yellowstone
 - destroy visitor access between West Yellowstone and other gateways.
 - force visitors to ride scheduled buses or vans between West Yellowstone and Old Faithful with supervised stops. Views would be obstructed by high snow banks and frosty windows.
 - create traffic hazards on plowed roads where wildlife is trapped between high snow horns and oncoming traffic.
3. I also object to Alternative B because it would
 - allow NPS to promulgate and enforce arbitrary air quality instead of leaving it to the Federal experts, the EPA.
 - have negative economic impacts on neighboring states and involve the elimination of several hundred jobs and over one hundred million dollars in lost revenues, as estimated by those neighboring states.
 - cost millions of dollars to implement these untested, unproven programs, as projected by NPS officials.

I support Revised Alternative E which supports:

- A. Ongoing scientific research and review of data and conclusions by non-biased third-party researchers
- B. Nighttime closure of park roadways between the hours of 10 p.m. and 6 a.m. to promote public safety, improve trail maintenance, and protect wildlife
- C. Provision for expanded non-motorized opportunities/trails away from main motorized routes.
- D. Preservation of the Continental Divide Snowmobile Trail.
- E. Continued over-snow motorized use of Jackson Lake.

I object to Alternative B because I oppose any alternative that plows or closes any park entrance to over-snow traffic and enforces any emission standards prior to the release of EPA's standards.

I support Revised Alternative E because I support all entrances to the park remaining open to the historical use of over-snow vehicles, and implementation of EPA's emission regulations when finished and released. I support requiring all west entrance passes to be pre-purchased at local outlets, or Public Lands Information Centers, to mitigate lines and congestion at entrance kiosks, and promotion of pre-paid entrance pass sales at the south gate. I support the enforcement of the existing 45 mph speed limit.

Sincerely,

Name: *Steve Gledgeth* Steve Gledgeth

Address: 2429 + 1st Hurst RD
Ofters v+ 05860

FORM LETTER 13**COMMENT:**

I object to "alternative B." According to a recent NPS survey nearly 70% of Yellowstone's winter visitors supported continued snowmobile access via West Yellowstone. In that same survey, only 4% supported the plowing of roads without a parallel trail for snowmobile use.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. NPS notes that the decision is not subject to a popular vote. The cited survey sampled current winter visitors, many of whom are snowmobilers. It is not surprising what the survey indicates in the way of preferences from these visitors. This particular survey does not sample people who do not or have not visited the park. Other surveys indicate that many people do not visit, or no longer visit, because of current management. The survey information, in any case, was useful in evaluating social and economic effects of the various alternatives as well as visitor access and experience.

COMMENT:

Alternative B would plow the road between West Yellowstone and Old Faithful which will create a missing link in the Grand Loop for snowmobilers, which would:

- make it difficult to reach Old Faithful from the north and east, and totally eliminate access to West Yellowstone.
- destroy visitor access between West Yellowstone and other gateways.
- force visitors to ride scheduled buses or vans between West Yellowstone and Old Faithful with supervised stops. Views would be obstructed by high snow banks and frosty windows.
- create traffic hazards on plowed roads where wildlife is trapped between high snow berms and oncoming traffic.

RESPONSE:

The effects of alternative B are disclosed in Chapter IV of the EIS. NPS notes: visitor access is not "destroyed" in any alternative, but the mode of access would be changed. The effects of snow berms would not be as extreme as indicated.

COMMENT:

I also object to alternative B because it would:

- allow NPS to promulgate and enforce arbitrary air quality instead of leaving it to the Federal experts, the EPA.
- have negative economic impacts on neighboring states and involve the elimination of several hundred jobs and over one hundred million dollars in lost revenues, as estimated by these neighboring states.
- cost millions of dollars to implement these untested, unproven programs, as projected by NPS officials.

RESPONSE:

The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports the Park Service's need to implement a plan that is consistent with the park service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units. Economic effects on neighboring states would be negligible. Effects on gateway communities, primarily on West Yellowstone, in several alternatives could be major, as disclosed in the EIS. There is no evidence as to the millions of dollars in cost alleged by the commenter.

FORM LETTER 13**COMMENT:**

I support Revised Alternative E which supports:

- A. Ongoing scientific research and review of data and conclusions by non-biased third-party researchers.
- B. Nighttime closure of park roadways between the hours of 10 p.m. and 6 a.m. to promote public safety, improve trail maintenance, and protect wildlife.
- C. Provision for expanded nonmotorized opportunities/trails away from main motorized routes.
- D. Preservation of the Continental Divide Snowmobile Trail.
- E. Continued oversnow motorize use of Jackson Lake.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the FEIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

I object to Alternative B because I oppose any alternative that plows or closes any park entrance to oversnow traffic and enforces any emission standards prior to the release of EPA's standards.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision. The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate.

Susan B. Hawkins
130 East Trenton Avenue
Fresno, CA 93720

NOV 18 1999

November 3, 1999

Mr. Clifford Hawkes
12795 West Alameda Parkway
Lakewood, Colorado 80228

Re: Yellowstone, Grand Tetons and the JDR Parkway DEIS Winter Use Plan

Dear Mr. Hawkes

I support the revised ALTERNATIVE E in the DEIS Winter Use Plan of Yellowstone Park, Grand Tetons Park and the John D. Rockefeller Parkway

1. This is the most effective plan because it emphasizes the protection of wildlife and other natural resources while allowing park visitors a range of winter recreation experience. It uses an adaptive planning approach and a third party review.
2. ALTERNATIVE E calls for an institution of an advisory committee which will consist of local, state and federal agencies, as well as representatives from the snowmobile industry and environmental groups.
3. It requires the sale of ONLY Bio-Base fuels within the Parks, beginning with the 2001-02 winter season
4. It establishes visitor carrying capacity to address overcrowding concerns and trail maintenance issues. It uses ADAPTIVE planning for long term capacities for visitors and wildlife
5. It will disperse use throughout the Parks by better utilizing EXISTING visitor facilities for lodging, food service and warming huts to reduce impacts on natural resources and to assure a quality visitor experience

Realizing the importance of maintaining these parks, but also the continued public use, and need for thriving gateway communities, I support the approval of REVISED ALTERNATIVE E. As a citizen who appreciates that STEWARDSHIP of public lands is the critical aspect of adaptive management, this alternative accomplishes that goal

Sincerely,


Susan Hawkins

FORM LETTER 14**COMMENT:**

I support the Revised Alternative E in the DEIS Winter Use Plan of Yellowstone Park, Grand Tetons Park and the John D. Rockefeller Memorial Parkway. This is the most effective plan because it emphasizes the protection of wildlife and other natural resources while allowing park visitors a range of winter recreation experiences. It uses an adaptive planning approach and a third party review. Alternative E calls for an institution of an advisory committee, which will consist of local, state and federal agencies, as well as representatives from the snowmobile industry and environmental groups. It requires the sale of ONLY bio-based fuels with the Parks, beginning with 2001-02 winter season. It establishes visitor carrying capacity to address overcrowding concerns and trail maintenance issues. It uses ADAPTIVE planning for long term capacities for visitors and wildlife.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. These features of Revised Alternative E are present in the range of alternatives that must be considered by the decision-maker before making a final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

RECEIVED

NOV 26 1999

DSC-PM

Winter Use Plan
National Park Service
12795 West Alameda Parkway
Denver, CO 80228
Attention: Clifford Hawkes

Dear Mr. Hawkes:

I wish to comment on the draft Winter Visitor Use Management Environmental Impact Statement (EIS) for Yellowstone National Park. I oppose the preferred alternative that would plow the road from West Yellowstone to Old Faithful. The DEIS has not adequately addressed the impacts of this or other alternatives. Following are some issues it has not sufficiently considered:

- * Economic impact on the surrounding communities.
- * Whether and how many visitors would like to travel by bus to Old Faithful in the winter; marketability of this idea to the traveler.
- * The DEIS claims plowing the road/travel by bus to Old Faithful would be more affordable. It has not considered the cost of plowing to the taxpayer.
- * Plowing's impact to the environment and wildlife, and if it can be maintained consistently considering the winter storms and snowfall.

I support revised Alternative E, which proposes reasonable regulation of snowmobiles for emissions. I support the Environmental Protection Agency's process in this effort. The National Park Service should follow EPA guidelines when they are developed.

I support snowmobiling in Yellowstone. It is the best way to individually appreciate the Park, in direct contact with the elements. I support the Grand Loop, which offers a continuous experience without back tracking. I wouldn't enjoy Yellowstone on a bus as a part of a supervised group.

National Parks are established for the use and enjoyment of people. While the Park's resources must be protected for the future, today's special experience must also be protected. Touring Yellowstone by snowmobile combines the grandeur of the Park's unique features with the freedom to experience it directly. The Winter Visitor Use Plan must protect this experience.

Thank you for considering my comments. Please put my name on your mailing list so I can be kept informed on this issue.

Sincerely,

David E. Mabbott Signature

David E. Mabbott Print Name

29086 Bridge Rd. Street

Hermiston, OR 97838 City, State, Zip

We, as a family, have enjoyed the activity of snowmobiling for many years. We strongly disagree with land closures to this safe, relatively clean and thoroughly enjoyable family activity.

David, Tara, & Hannah
Mabbott

FORM LETTER 15

COMMENT:

I oppose the preferred alternative that would plow the road from West Yellowstone to Old Faithful.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

The DEIS has not adequately addressed the impacts of this or other alternatives. Following are some issues it has not sufficiently considered:

- Economic impact on the surrounding communities.
- Whether and how many visitors would like to travel by bus to Old Faithful in the winter; marketability of this idea to the traveler.
- The DEIS claims plowing the road /travel by bus to Old Faithful would be more affordable. It has not considered the cost of plowing to the taxpayer.
- Plowing's impact to the environment and wildlife, and if it can be maintained consistently considering the winter storms and snowfall.

RESPONSE:

- The DEIS has adequately disclosed the impacts of alternative B and all other alternatives on surrounding communities.
- The current population of winter users, predominantly those who snowmobile, obviously would not care to access the park on a bus in the winter. There is sufficient information to indicate that people who are not part of the snowmobile culture (including those who ride snowcoaches) would use a mass transit system on a plowed road. NPS believes this to be highly marketable in the national or even global setting.
- NPS has considered the cost of plowing the road (see Appendix F in the DEIS); it is roughly comparable to the amount spent on grooming the road for oversnow use. Regardless of the cost to NPS for management of this road segment, the cost to the visitor for transportation would most likely be less.
- The impacts of plowing the road are disclosed for each alternative in the wildlife section. Other roads in the GYA having similar snow loads are plowed and maintained for wheeled vehicle traffic. This does not mean that they are always passable and the same would be true for the West Yellowstone to Old Faithful route.

It is the Park Service's impression that what is meant by this comment (e.g. issues not sufficiently considered) is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker.

COMMENT:

I support reasonable regulation of snowmobiles for emissions and noise. I support the Environmental Protection Agency's process in this effort. The National Park Service should follow EPA guidelines when they are developed.

RESPONSE:

The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports the Park Service's need to implement a plan that is consistent with the Park Service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units.

FORM LETTER 15**COMMENT:**

I support snowmobiling in Yellowstone as it has been traditionally available. It is the best way to individually appreciate the Park, in direct contact with the elements. I support the Grand Loop, which offers a continuous experience without back tracking. I wouldn't enjoy Yellowstone on a bus as part of a supervised group.

RESPONSE:

Support for an alternative, or an alternative feature, is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Statements of support by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same, including those alternatives that maintain the traditional snowmobiling experience.

COMMENT:

National Parks are established for the use and enjoyment of people. While the Park's resources must be protected for the future, today's special experience must also be protected. Touring Yellowstone by snowmobile combines the grandeur of the Park's unique features with the freedom to experience it directly. The Winter Visitor Use Plan must protect this experience.

RESPONSE:

National Parks were established as lands and resources reserved for their protection. NPS is directed in the establishment legislation to provide for enjoyment of the resources in a manner that leaves them unimpaired for future generations. In other comments on the DEIS, many people strongly object to the presence of snowmobiles as being destructive of their use and enjoyment of the parks. On this issue, the public is strongly divided. NPS understands that snowmobiling in the parks is for many people an enjoyable and special experience. NPS is committed to finding the appropriate level and type of winter use -- that level which assures protection of resources for enjoyment by future generations. In a nutshell, this represents the purpose and need for action that frames the analysis in the EIS.

November 19, 1999

Yellowstone Winter Use Plan
National Park Service
12795 West Alameda Parkway
Lakewood, Colorado 80228

Dear Sir or Madam,

I am a snowmobile enthusiast and am writing this letter in **STRONG SUPPORT** of the SpecRibben Coalition's REVISED "ALTERNATIVE E".

We should not take the rights away from anyone if there is an alternative which can be reached by everyone.

We should regulate emissions and noise on snowmobiles not take away our rights to ride in OUR Yellowstone Park or Grand Teton Parks.

Thank you for taking the time to read this and affording me the opportunity to state my opinion.

Sincerely,

Mary Sue Brandenburg

FORM LETTER 16

COMMENT:

I am a snowmobile enthusiast and am writing this letter in strong support of the Blue Ribbon Coalition's Revised Alternative E.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of "Revised Alternative E" with EIS alternatives.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

We should not take the rights away from anyone if there is an alternative that can be accepted by everyone.

RESPONSE:

There is no right to access the park, or to use the park, in any way that is demonstrated to have an adverse impact on park resources and values. Recognizing this as an issue, and that the extent, duration and severity of an impact must be determined, NPS has evaluated and disclosed impacts in the EIS. The park service decision maker must consider the full range of alternatives and their impacts as disclosed in the Final EIS before making a decision. Although it is of interest to note how many people have expressed support for various alternatives, the decision is likely to hinge on the assessment of impacts. NPS notes that there is no "consensus" alternative. Comments expressing support or objection to various alternatives are highly polarized. Many desire no change in access (as represented by Revised Alternative E) and many desire either a ban on snowmobiles (The Citizens Solution) or a ban on all motorized access in the winter (The Natural Regulation Alternative). The latter alternative is not being considered.

COMMENT:

We should regulate emissions and noise on snowmobiles not take away our rights to ride in our Yellowstone Park or Grand Teton Parks.

RESPONSE:

See previous for a discussion of "rights". In this EIS, a number of alternatives or alternative features are considered for the reduction of emissions and noise while allowing snowmobile access. The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports the Park Service's need to implement a plan that is consistent with the park service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units.

November 15, 1999

Clifford Hawkes
National Park Service
12795 W Alameda Parkway
Lakewood, Colorado 80228

Dear Mr. Hawkes:

I am writing in regards to the Winter Use Plan for the Yellowstone and Grand Teton Nat'l Parks.

I am writing in support of Revised Alternative E.

I would choose this alternative because it would not shut the snowmobiler off from any entrance. Also local, county, state and federal agencies as well as representatives from the snowmobile industry and environmental groups would participate on the advisory committee. I feel this to be a balanced committee with all interested parties represented.

Alternative B is absolutely unacceptable in that it does not permit snowmobiles to access West Yellowstone from the park nor enter the park through the West Entrance. It also leaves the Loop through the park with a missing link, therefore making travel very, very inconvenient.

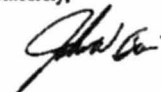
I would hope that a balance could be reached where wildlife and the environment could be conserved and yet the beauty and splendor of the park could be enjoyed by the public.

A concern about plowing the road from West Yellowstone to Old Faithful is that if the buffalo were following the groomed snowmobile trails out of the park, as suggested earlier, then won't it be even easier for them to walk on a plowed road--right out of the park.

So in closing I would urge the committee looking at these matters to consider that as a snowmobiler, -- I would like to look forward to coming to the park in the future and not finding that there are NO open trails--or trails so broken up that access is a nightmare. I am willing to follow the rules, like using smokeless oil and having snowmobiles which meet the sound ordinances established by this committee. But I truly feel that plowing the road at the West entrance and not allowing a snowmobile trail along with it would be an injustice to snowmobilers.

Thank you for your consideration to my views.

Sincerely,


120 2nd St SE
Brooklyn, MO
5706

FORM LETTER 17

COMMENT:

I am writing in support of Revised Alternative E. I would choose this alternative because it would not shut the snowmobiler off from any entrance. Also local, county, state and federal agencies as well as representatives from the snowmobile industry and environmental groups would participate on the advisory committee. I feel this to be a balanced committee with all interested parties represented.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the FEIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

COMMENT:

Alternative B is absolutely unacceptable in that it does not permit snowmobilers to access West Yellowstone from the park nor enter the park through the West Entrance. It also leaves the Loop through the park with a missing link, therefore making travel very, very inconvenient.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The impacts of alternative B, as noted briefly in this letter, are disclosed in the EIS for consideration by the decision maker.

COMMENT:

I would hope that a balance could be reached where wildlife and the environment could be conserved and yet the beauty and splendor of the park could be enjoyed by the public.

RESPONSE:

A balance of recreation use, access and resource protection is conveyed by the purpose and need for action that frames analysis in the EIS. See DEIS and FEIS Chapter I. It should be clear that winter recreation use is constrained by the need to protect and preserve resources under NPS mandate described in the EIS. In other words, the balance does not require NPS to allow recreation or certain forms of access (or unlimited numbers of visitors) at the expense of park resources and values.

COMMENT:

A concern about plowing the road from West Yellowstone to Old Faithful is that if the buffalo were following the groomed snowmobile trails out of the park, as suggested earlier, then won't it be even easier for them to walk on a plowed road—right out of the park.

RESPONSE:

Impacts of groomed and plowed surfaces on bison are discussed under each alternative in the EIS. It is clear that scientists do not agree about these impacts on the bison population. Impacts on individual bison are fairly evident. One thing that is apparent in the record is that most bison *do not* use groomed routes to exit the park. So, if leaving the park is the issue then it matters little whether the road is plowed or groomed, or not.

BULLWINKLE'S SALOON GAMBLING & EATERY

14 MADISON AVENUE • P.O. BOX 314

WEST YELLOWSTONE, MT 59758

PHONE: 406-646-7914 • FAX: 406-646-7924

Received Doc.
Architecture

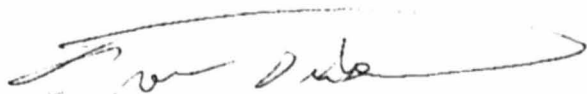
NOV 16 1999

October 21, 1999

To Whom This May Concern,

I do not support any alternative that plows or closes any park entrance to over snow traffic. I support the revised Alternative E. Alternative F is a responsible way of managing winter use of Yellowstone Park so that all people may enjoy it.

Thank-you,



P.O. Box 314

West Yellowstone, MT

59758

Drew Dickens

FORM LETTER 18

COMMENT:

I do not support any alternative that plows or closes any park entrance to over snow traffic.

RESPONSE:

The expression of an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Comments by themselves convey no information that would be cause for any alternative in the FEIS. The range of alternatives considered in the FEIS remains the same.

The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and approves the Park Service's plan to implement a plan that is consistent with the Park Service mission. EPA notes that it is not likely to deal with seasonal or emergency air regulatory actions in the near future. As NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for over snow or other vehicles, those regulations would certainly apply to the Park units.

COMMENT:

I support the Revised Alternative E. Alternative E is a responsible way of managing winter use of Yellowstone Park so that all people may enjoy it.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the FEIS. Many people who commented did not like the "mix" of features in the FEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the rest of FEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comments Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with FEIS alternatives.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expression of support convey no information that by themselves would be cause for any alternative in the FEIS. The range of alternatives considered in the FEIS remains the same.

Author: [REDACTED]
Date: 11/16/1999 10:46 PM
Priority: Normal
TO: YELL Winter Use at NP-YELL
Subject: winter use plan opinion

I have become aware of the Draft Environmental Impact Statement for Yellowstone and Grand Teton National Park and I would like to comment. I am very disappointed to see that Alternative B would completely change winter visits to the "People's Park." I oppose Alternative B.

According to your own study, only 4 percent of the visitors supported plowing the road from West Yellowstone to Old Faithful without a parallel snowmobile route being provided. You also estimate that plowing this road will result in a \$12.4 million decrease in visitor spending.

Please explain why you would support such a drastic cut in visitors and in economic impact. I always thought that Yellowstone was the People's Park.

I support Revised Alternative E, which is much more reasonable and logical and includes:

- . A commitment to develop acceptable measures for mitigating impacts.
 - . Selling only bio-based fuels. Considering these fuels are now available and are now being used by many, only those fuels should be sold after the 2001 season.
 - . Enforce the posted speed limit, and close the Park from 10 p.m. to 6 a.m. daily.
 - . Provide additional warming huts where facilities do not currently exist. This would encourage visitors to disperse throughout the Park instead of gathering at Old Faithful.
 - . Require all West Gate entrance passes to be pre-purchased. Pre-paid passes should also be promoted at the other gates as well.
- I do not believe that Alternative B is based on good science and it does not sufficiently consider the impacts on this alternative on the visitor experience, the wildlife and the resources.

Please consider my comments. I have always wanted to take my son, who is four, on a snowmobiling vacation in Yellowstone and the Tetons when he is old enough to make the trip. Please don't act to take the People's Park away from people like us.

Finally, I would like to be added to your mailing list for all future Yellowstone National Park plans. Thank you.

Sincerely,

John Lockhart
460 Cabin Hollow Road
Dillsburg, PA 17019

[REDACTED]

FORM LETTER 19

COMMENT:

I am very disappointed to see that alternative B would completely change winter visits to the "People's Park." I oppose alternative B.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision.

COMMENT:

According to your own study, only 4 percent of the visitors supported plowing the road from West Yellowstone to Old Faithful without a parallel snowmobile route being provided. You also estimate that plowing this road will result in a \$12.4 million increase in visitor spending.

RESPONSE:

NPS notes that the decision is not subject to a popular vote. The survey in question sampled current winter visitors, many of whom are snowmobilers. It is not surprising what the survey indicates in the way of preferences from these visitors. This particular survey does not sample people who do not or have not visited the park. Other surveys indicate that many people do not visit, or no longer visit, because of current management. The survey information, in any case, was used in evaluating social and economic effects of the various alternatives as disclosed in the EIS. An EIS is intended to show the consequences of alternatives that are being considered.

COMMENT:

Please explain why you would support such a drastic cut in visitors and in economic impact. I always thought Yellowstone was the People's Park.

RESPONSE:

The rationale for the DEIS preferred alternative may be found in the DEIS in Chapter II. The preferred alternative in the FEIS is alternative G rather than B.

COMMENT:

I support Revised Alternative E, which is much more reasonable and logical and includes: 1) a commitment to develop acceptable measures for mitigating impacts; 2) selling only bio-based fuels. Considering these fuels are now available and are snow being used by many, only those fuels should be sold after the 2001 season; 3) enforce the speed limit and close the park from 10 p.m. to 6 a.m. daily; 4) Provide additional warming huts where facilities do not currently exist. This would encourage visitors to disperse throughout the Park instead of gathering at Old Faithful; 5) Require all West Gate entrance passes to be pre-purchased. Pre-paid passes should also be promoted at the other gates as well.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackaged Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See Chapter II in the FEIS, Alternatives Suggested During the Public Comment Period, for a comparison of Revised Alternative E to alternative features in the EIS.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. These features of Revised Alternative E are present in the range of alternatives that must be considered

FORM LETTER 19

by the decision maker before making a final decision. See the section "Alternatives Suggested during the Public Comments Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative B with EIS alternatives.

The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the FEIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

COMMENT:

I do not believe that alternative B is based on good science and it does not sufficiently consider the impacts on this alternative on the visitor experience, wildlife and the resources.

RESPONSE:

The OEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate. An EIS is not, per se, a scientific document. CEQ regulations (40 CFR §1502.22) allow the use of the best available information and techniques to support an analysis where data is incomplete or unavailable. It is the Park Service's impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker.

Author: "nhwnk" [REDACTED]
Date: 11/30/99 7:19 PM
TO: YELL Winter Use at WP-YELL
Subject: snowmobiling in yellowstone and grand teton
----- Message Contents

Mr. Clifford Hawkes
National Park Service
12795 west Alameda Parkway
Lakewood, Colorado 80228
Dear Mr. Hawkes:

I wish to comment on the Draft Winter Visitor Use Plan and Draft Environmental Impact Statement (DEIS) for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr. Memorial Parkway. I support snowmobiling in the Parks. I support a Revised Alternative E.

This Revised Alternative E allows adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the Parks. It protects the Grand Loop snowmobiling experience, with snowmobile access from all current entrances and maintains the Continental Divide Snowmobile Trail.

It also allows reasonable regulation of snowmobiles for emissions and sound. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed. Also, it provides non-motorized opportunities and trails away from main motorized routes.

I oppose the preferred Alternative B that would plow the road from West Yellowstone to Old Faithful. The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

National Parks are established for the use and enjoyment of all people and that includes winter tourism by snowmobilers such as myself. The Winter Visitor Use Plan must protect this experience.

Thank you for considering my comments.

Regards,

Michael E. McLaughlin
6291 Locomotive Lane
Cicero, N.Y. 13039

FORM LETTER 20

COMMENT:

I support snowmobiling in the Parks. I support a Revised Alternative E. This Revised Alternative E allows adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the Parks. It protects the Grand Loop snowmobiling experience, with snowmobile access from all current entrances and maintains the Continental Divide Snowmobile Trail. It also allows reasonable regulation of snowmobiles for emissions and sound. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed. Also, it provides nonmotorized opportunities and trails away from main motorized routes.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The listed features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the FEIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

I oppose the preferred alternative B that would plow the road from West Yellowstone to Old Faithful.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision.

COMMENT:

The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

RESPONSE:

The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. It is the Park Service's impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker. Since the preferred alternative changes in the FEIS, the discussion of alternative B as preferred is academic.

FORM LETTER 20**COMMENT:**

National Parks are established for the use and enjoyment of all people and that includes winter tourism by snowmobilers such as myself. The Winter Use Plan must protect this experience.

RESPONSE:

NPS points out that a great number of taxpayers commented on the DEIS. Many strongly objected to the presence of snowmobiles. NPS is committed to finding the appropriate level and type of winter use – that level which assures protection of resources for enjoyment by future generations. In a nutshell, this represents the purpose and need for action that frames the analysis in the EIS.

November 21 1999

Mr. Robert Stanton
Director National Park Service
1849 C Street Northwest
Washington D.C. 20240-0001

Dear Mr Stanton

I am submitting this letter to express concerns with proposed winter Alternatives Use Plans for Yellowstone National Park. After examining the Draft Environmental Impact Statement, as a snowmobiler I was disappointed.

According to the Draft, 61% of all winter visitors to the Park are snowmobilers. Another fact pointed out in the Draft was 90% of visitors using the West Entrance Station were snowmobilers. The citizens that use the Park add to the local economy and provide themselves an excellent way to view the sites at this national treasure.

As a responsible snowmobiler, and a member of The Frozen Forty Snowmobile Club in Flushing, Michigan, I see a need to have laws that protect the environment and keep this activity safe. I feel that any changes in the Parks operation that would limit activities should be decided by a committee that includes local snowmobilers, Local Officials, and State Officials.

It has been reported in the news that the Park Service Officials testing of snowmobile emissions was conducted to make it look like the the amount of emissions emitted by snowmobiles was greater than it actually was. This type of behavior could be expected of some selfish environmental groups, however should not be tolerated by Public Officials. I would think the Park Service would do all it could to make winter visitors welcome and not to exclude those of us who wish to visit on snowmobiles as part of our winter Park experience. I would hope that those responsible for this are investigated and punished so that the public can see that the Park Service is operating for the benefit of all citizens not just those who want to close the Parks for selfish reasons of there own.

Of all the proposals thus far presented, I would support the revised Plan E. I hope that this letter helps you to find a fair solution to the problems that have come with the growing interest in snowmobiling in Yellowstone National Park. I think it is wonderful that so many citizens have found that ours Park Systems are as wonderful in the winter as they are in summer.

Sincerely,

Robert Stanton
2349 W. Searles Rd
Flushing Michigan
48433

FORM LETTER 21

COMMENT:

As a responsible snowmobiler, and a member of the Frozen Forty Snowmobile Club in Flushing, Michigan, I see a need to have laws that protect the environment and keep this activity safe. I feel that any changes in the Parks operation that would limit activities should be decided by a committee that includes local snowmobilers, local officials, and state officials.

RESPONSE:

The commenter is directed to Chapter I and Appendix C in the EIS, where laws, regulations, executive orders and policies relevant to this action are thoroughly presented. Park operations and any changes in them are solely in the authority of the National Park Service. The public has had numerous opportunities to be involved and express their opinions during the preparation of this EIS, under NEPA regulations.

COMMENT:

It has been reported in the news that the Park Service Officials testing of snowmobile emissions emitted by snowmobiles was greater than it actually was. This type of behavior could be expected of some selfish environmental groups, however, should not be tolerated by public officials.

RESPONSE:

It is unfortunate that a mathematical error in an NPS Air Resource Division report was made, and an inappropriate comparison made. The report was not a study, but a literature review. The review was not connected in any way with the preparation of the draft EIS, although the literature (not containing the referenced error) was used by the EIS team. The "tainted" information was not part of the DEIS and it was not reported, used or cited therein. It is also unfortunate that some interest groups chose to use this occurrence as an indictment of the EIS, and to widely report it to their constituencies as improper behavior and biased analysis when this has not been the case. The report in question was withdrawn by the Air Resources Division, corrected and put back into circulation.

COMMENT:

Of all the proposals presented, I would support the revised Plan E. I hope that this letter helps you to find a fair solution to the problems that have come with the growing interest in snowmobiling in Yellowstone National Park. I think it is wonderful that so many citizens have found that our park is as wonderful in the winter as it is in the summer.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. Those alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features. The final decision is long as the effects of the features were sufficiently analyzed. Therefore, it is necessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the DEIS, which presents a comparison of Revised Alternative E with DEIS alternatives.

The features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the FEIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

Received DEC-
Architecture

NOV 16 1999

November 11, 1999

Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes,

RE: Comments on the Winter Use Plan, Draft Environmental Impact Statement for the Yellowstone and Grand Teton National Parks, and John D. Rockefeller, Jr., Memorial Park, July, 1999.

In October of 1998, I submitted comments on the Draft Environmental Impact Statement for the Interagency Bison Management Plan for the State of Montana and Yellowstone National Park. In the 1998 DEIS, it was stated that during the winter months the Bison were leaving the Park by route of the groomed snowmobile trails. After a little research, it was revealed that the Bison leaving the Park, left way before the snow fell, thus they did not exit the Park on groomed snowmobile trails. It is my opinion that your sole objective in both DEIS's, is to completely eliminate snowmobiling in Yellowstone National Park. This is not acceptable. Now you have focused your efforts on the environment and the damage that occurs from snowmobile emissions. Your numbers are based on junk science and old information. A properly tuned two-stroke engine emits less harmful emissions than an automobile. Today's snowmobiles are too expensive for the owner to allow them to run ineffectually. Maybe you should focus your efforts on the truth instead of spending so much time trying to twist the facts. Has the West Entrance area been inventoried for wood stoves? West Yellowstone is a community heavily dependent on wood stove heat. The air pollution index that was measured could be from other sources. The following pages contain my comments on the July 1999 DEIS.

I want to state for the record, that I am totally opposed to the Preferred Alternative, and all other alternatives published within this document including Alternative A, the "No Action" alternative. I oppose any alternative that plows or closes Park entrances to over the snow travel, or any alternative that establishes emission standards outside the EPA process. According to the DEIS, the Park Service's Preferred Alternative would plow the road between West Yellowstone and Old Faithful. This will create a missing link in the Grand Loop for snowmobilers, making it difficult to reach Old Faithful from the north and east entrances, and totally eliminating access from West Yellowstone. Plowing the road between West Yellowstone and Old Faithful must be some kind of joke. What are you going to do with all that snow and what are the costs of removal going to run? Who will pay for it? Just a year ago, you said that the Bison were leaving the Park on groomed snowmobile trails, now you want to plow the roads so they can leave easier?

Clifford Hawkes, National Park Service
RE: Winter Use Plan DEIS, July 1999
November 11, 1999
Page 2 of 3

Plowing roads force visitors to ride scheduled buses or vans between West Yellowstone and Old Faithful with supervised stops (how exciting). In order to provide safe passage for buses or vans, the road must be plowed to the pavement. It will be highly unlikely to keep the road plowed during stormy weather, thus the buses or vans must carry snow chains that will seriously damage the pavement creating unnecessary and costly pavement maintenance. Also, by plowing roadways through the Park, you will create traffic hazards with ice and snow on the roadway. Plowing will also create high snow banks on either side of the road, preventing wildlife from moving easily across the road or possibly trapping wildlife between the snow banks. High snow banks will also prevent passengers on the buses or vans from seeing out over the snow banks, if they will be able to see at all through frosty windows. I don't think that who ever thought that the road between West Yellowstone and Old Faithful could be plowed for buses or vans thought about safety for the visitors or the wildlife.

I am in support of Revised Alternative E as proposed by the BlueRibbon Coalition, the American Council of Snowmobile Associations, the International Snowmobile Manufacturers Association, and citizens of gateway communities. Revised Alternative E applies adaptive planning that uses new information as it is developed to responsibly manage winter recreation in Yellowstone and Grand Teton National Parks. It proposes: 1) All entrances to the Park to remain open to historical use of over the snow vehicles. Promotion of pre-paid entrance-pass sales at the south gate. Enforcement of existing 45 mph speed limit. 2) Support for ongoing scientific research and the peer review of data and conclusions by non-biased third-party researchers. 3) Nighttime closure of park roadways between the hours of 10pm and 6am to promote public safety, improve trail maintenance, and protect wildlife. 4) Reasonable regulation of snowmobile emissions. Support for the Environmental Protection Agency's process in regulating emissions. Require NPS implementation of EPA emissions guidelines when they are developed. 5) To provide for non-motorized opportunities and trails away from main existing motorized routes. 6) To relieve congestion through the use of pre-paid passes and an improved parking plan at Old Faithful. 7) The preservation of the Continental Divide Snowmobile Trail and motorized over-snow use at Jackson Lake. 8) Use of bio-based fuels [10% ethanol blend fuel and synthetic low-emission oil] within the Park beginning with the 2001-02 winter season. All rental operators at all Park gateways would be encouraged to use bio-based fuels. And 9) Protection of the public's prime winter recreation experience through establishment of carrying capacities.

In closing, I encourage Park management. I understand concerns regarding wildlife and user safety, the concerns regarding resource damage, and the issues of snowmobile emissions. But these concerns and issues must be handled per the facts, fairly and honestly. Revised Alternative E addresses and handles these issues. I look forward to the future, and taking my children through Yellowstone National Parks on snowmobiles. I have told them about my adventures through the Park and shown them pictures, but

Clifford Hawkes, National Park Service
RE: Winter Use Plan DEIS, July 1999
November 11, 1999
Page 3 of 3

they, in no way, match the experience of riding a snowmobile through Yellowstone National Park. It is an experience that anyone can have. If you don't own a snowmobile, there are places that will rent you one for the trip. I think everyone should take the time for the ride!

Please keep me on your mailing list to receive any additional information on this important project. Thank you for your time.

Sincerely,



Kenneth A. Anderson
730 Greenhorn Rd.
Yreka, CA 96097
[REDACTED]

FORM LETTER 22

COMMENT:

In the 1998 DEIS, it was stated that during the winter months the Bison were leaving the park by route of the groomed snowmobile trails. After a little research, it was revealed that the Bison leaving the Park, left way before the snow fell, thus they did not exit the Park on groomed snowmobile trails.

RESPONSE:

Facts and numbers revealed in the EIS are based on current literature, simply cited and summarized. The commenter offers no evidence or suitably referenced studies that dispute the "science" contained in the EIS. During the winter use EIS process, it has always been maintained that bison do not routinely exit the parks on groomed surfaces. Also, there is no professional, scientific disagreement about the notion that current snowmobiles entering the parks (tuned or not) emit more in the way of some pollutants than do automobiles.

COMMENT:

I am totally opposed to the Preferred Alternative, and all other alternatives published within this document including alternative A, the "No Action" alternative. I oppose any alternative that plows or closes Park entrances to over the snow travel, or any alternative that establishes emission standards outside the EPA process. According to the DEIS, the Park Service's Preferred Alternative would plow the road between West Yellowstone and Old Faithful must be some kind of Joke. This will create a missing link in the Grand Loop for snowmobilers, making it difficult to reach Old Faithful from the north and east entrances, and totally eliminating access from West Yellowstone. Now you have focused your efforts on the environment and the damage that occurs from snowmobile emissions. You numbers are based on junk science and old information. A properly tuned two-stroke engine emits less harmful emissions then an automobile. Today's snowmobiles are too expensive for the owner to allow them to run ineffectually.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. NPS notes that the decision is not subject to a popular vote. The preferred alternative in the FEIS changes from B to G. The effects of all alternatives, including those on B, are disclosed in Chapter IV of the EIS. The effects of snow berms would not be as extreme as indicated in the comment. The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports the park service's need to implement a plan that is consistent with the park service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units.

COMMENT:

I am in support of Revised Alternative E as proposed by the Blue Ribbon Coalition, the American Council of Snowmobile Associations, the International Snowmobile Manufacturers Association, and the citizens of gateway communities. Revised Alternative E applies adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the Yellowstone and Grand Teton National Parks.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. The

FORM LETTER 22

decision maker will express her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision-maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

October 15, 1999

Mr. Clifford Hawkes
National Park Service
12795 West Alameda Parkway
Lakewood, Colorado 80228

Received

NOV 12 1999

DSC-RP

Dear Mr. Hawkes:

I wish to comment on the Draft Winter Visitor Use Plan and Draft Environmental Impact Statement (DEIS) for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr. Memorial Parkway. I support snowmobiling in the Parks. I support a Revised Alternative E that will:

- * Apply adaptive planning that uses new information as it is developed to responsibly manage winter recreation in the Parks.
- * Protect the Grand Loop snowmobiling experience, with snowmobile access from all current entrances. Maintain the Continental Divide Snowmobile Trail.
- * Reasonably regulate snowmobiles for emissions and sound. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed.
- * Provide non-motorized opportunities and trails away from main motorized routes.
- * Prohibit plowed road access anywhere in YNP during the winter season, with the exception of continued automobile access to northern attractions in the Gardiner, Mammoth, Tower-Roosevelt and Cooke City areas.

I oppose the preferred Alternative B that would plow the road from West Yellowstone to Old Faithful. The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

National Parks are established for the use and enjoyment of people. While the Park's resources must be protected for the future, today's special winter visitor experience must also be protected. Touring Yellowstone by snowmobile combines the grandeur of the Park's unique features with the freedom to experience it directly. The Winter Visitor Use Plan must protect this experience.

Thank you for considering my comments. Please put my name on your mailing list so I can be kept informed on this issue.

Sincerely



Allan Ranick
1267 So. 164th St.
Omaha, NE 68130

FORM LETTER 23

COMMENT:

I support a Revised Alternative E that will:

- Apply adaptive planning, that uses new information as it is developed to responsibly manage winter recreation in the Parks
- Protect the Grand Loop snowmobiling experience, with snowmobile access from all current Park entrances
- Maintain the Continental Divide Snowmobile Trail.
- Reasonably regulate snowmobiles for emissions and noise. I support the Environmental Protection Agency's process in regulating emissions. The National Park Service should follow EPA guidelines for emissions when they are developed.
- Provide non-motorized opportunities and trails away from main motorized routes.
- Prohibit plowed road access anywhere in YNP during the winter season, with the exception of automobile access to northern attractions in the Gardiner, Mammoth, Tower-Roosevelt, and Cooke City areas.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were adequately analyzed. Therefore, it is unnecessary to package Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The listed features of "Revised E" are present in the range of alternatives that must be considered by the decision maker before making a final decision. The decision maker will explain her or his rationale for the selection in the Record of Decision to be published 30 days after the Final EIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Expressions of support convey no information that by themselves would cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

I oppose the preferred alternative B that would plow the road from West Yellowstone to Old Faithful.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the Final EIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision.

COMMENT:

The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

FORM LETTER 23

RESPONSE:

The DEIS has accurately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. It is the Park Service's impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker. Since the preferred alternative changes in the FEIS, the discussion of alternative B as preferred is academic.

COMMENT:

National Parks are established for the use and enjoyment of people. While the Park's resources must be protected for the future, today's special winter visitor experience must also be protected. Touring Yellowstone by snowmobile combines the grandeur of the Park's unique features with the freedom to experience it directly. The Winter Visitor Use Plan must protect this experience.

RESPONSE:

NPS points out that a great number of taxpayers commented on the DEIS. Many strongly objected to the presence of snowmobiles. NPS is committed to finding the appropriate level and type of winter use -- that level which assures protection of resources for enjoyment by future generations. In a nutshell, this represents the purpose and need for action that frames the analysis in the EIS.

Clifford Hawkes
National Park Service
12795 West Alameda Parkway
Lakeview, CO 80228

Dear Mr. Hawkes,

Thank you for the opportunity to comment on The Draft Winter Use Plan and Draft Environmental Impact Statement for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr., Memorial Parkway.

I am extremely concerned about possible restrictions to my use of my National Parks.

I adamantly oppose the Preferred Alternative and all other alternatives that propose closure of park roads or the implementation of mass transit as the primary means of transportation.

Your own document demonstrates clearly that these planning alternatives would inflict unacceptable adverse impacts upon animals, visitor experience, and the socio-economic well-being of neighboring towns, counties, and states. Based on the evidence provided in the DEIS, these adverse impacts would not serve to produce the desired positive effect, and are, therefore, fruitless.

Further, as a taxpayer, I'm opposed to implementing horrendously expensive unproven, poorly researched programs like the mass transit alternatives when your visitor surveys indicate that the public does not support and probably would not USE such transportation.

I support the BlueRibbon/ACSA Amended Alternative E.

Amended Alternative E embraces sound science, as well as continued appropriate, responsible, and diversified use of the National Parks. This alternative creates the desired effects, and supports the NPS mission to preserve and protect and to maintain National Parks for the benefit and enjoyment of the people.

I urge you to support Alternative E as amended by the BlueRibbon Coalition, The American Council of Snowmobile Associations.

Thank you for your time in consideration.

Sincerely,

Signature

Anthony Steffenhagen

Print Name

Anthony Steffenhagen

Address

7266 Maplewood Ct.

City

Maplewood, MO zip 65051

cc: U.S. Legislators

FORM LETTER 24

COMMENT:

Your own document demonstrates clearly that these plowing alternatives would inflict unacceptable adverse impacts upon animals, visitor experience, and the socio-economic well being of neighboring towns, counties, and states.

RESPONSE:

Concerns about visitor experience are included in the purpose and need for action expressed in Chapter I of the EIS. There are equal concerns about the impacts of snowmobiling on the experiences of other visitors to the park, and on park resources and values.

COMMENT:

I adamantly oppose the Preferred Alternative and all other alternatives that propose plowing of the park roads or the implementation of mass transit as the primary means of transportation.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision.

COMMENT:

Further, as a taxpayer, I am opposed to implementing horrendously expensive unproven, poorly researched programs like the mass transit alternatives when your visitor surveys indicate that the public does not support and probably would not USE such transportation.

RESPONSE:

NPS points out that a great number of taxpayers commented on the DEIS. Many strongly objected to the presence of snowmobiles. NPS is committed to finding the appropriate level and type of winter use – that level which assures protection of resources for enjoyment by future generations. In a nutshell, this represents the purpose and need for action that frames the analysis in the EIS. NPS notes that mass transit is a feasible concept – mass transit has been used for a number of years in YNP during the summer and winter. It is a proven mode of transport. Another note, the body of information provided in surveys and disclosed in the EIS indicates that there are a great many people who do not have use of snowmobiles in the parks. Snowmobilers do not wish to access the parks via mass transit as reflected in the current winter visitor survey. However, there is no rationale to assume that a great many other people would not avail themselves of the opportunity to visit the parks during the winter by an alternative mode of transport.

COMMENT:

Amended Alternative E embraces sound science, as well as continued appropriate, responsible, and diversified use of the National Parks. This alternative creates the desired effects, and supports the NPS mission to preserve and protect and to maintain the National Parks for the benefit and enjoyment of the people.

FORM LETTER 24

Response

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with EIS alternatives.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

November 12, 1999

Mr. Clifford Hawkes
Winter Use Plan
National Park Service
12795 W. Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

I would like to comment on the Draft Environmental Impact Statement for Yellowstone and Grand Teton National park. I am surprised and upset to see that preferred Alternative B would drastically change snowmobiling in the "People's Park". I oppose Alternative B.

As proposed in Alternative B, eliminating the Grand Loop experience for winter users is as devastating as eliminating snowmobile access from West Yellowstone. This will cause greater crowds at Old Faithful because you are no longer allowing the crowds to disperse into other areas of the Park.

I am also questioning the NPS's desire to establish emission standards when the federal expert, the EPA is currently working on the regulation of snowmobile emissions. It seems only appropriate that the NPS defer to the EPA for their expertise in this area.

I would suggest you consider Revised Alternative E which would include:

- Require the sale of ONLY bio-based fuels in the Parks beginning with the 2001-02 season.
- Establish an interim visitor carrying capacity based on the past 7-year use patterns. This would address overcrowding and trail maintenance.
- Close the Parks from 10 pm to 6 am to protect wildlife and promote safety.
- Implementation of the EPA's emission standards when they are developed.
- Development of new sound requirement for all over-snow vehicles.

In short, I support good science being applied to the Parks. As a snowmobiler, I have always felt it is very important to protect our environment. By giving serious consideration to Revised Alternative E, I am sure you will agree that, using good science will continue the NPS to protect the Parks for the future and also allow reasonable winter use.

Thank you for considering my comments. Please add me your mailing list for Yellowstone.

Sincerely,

Tea Holt

Address 3131-113th Ave. NW

Coon Rapids, MN 55433

FORM LETTER 25

COMMENT:

I am very disappointed to see that your preferred alternative B would drastically change snowmobiling in the "People's Park". I oppose alternative B.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same.

COMMENT:

As proposed in alternative B, eliminating the Grand Loop experience for winter users is as devastating as eliminating snowmobile access from West Yellowstone. This will lead to greater crowds at Old Faithful because you are no longer allowing the crowds to disperse in to other areas of the Park.

RESPONSE:

The impacts of alternative B on visitor opportunities, access and experience are adequately disclosed in the DEIS and the FEIS.

COMMENT:

I am questioning the Park Service's desire to establish emissions standards when the federal expert, the EPA, is currently working on the regulation of snowmobile emissions. It seems only appropriate that the NPS defer to the EPA for their expertise in this area.

RESPONSE:

The EPA regulates emissions, but NPS has the authority and responsibility to protect park resources and values. EPA understands and supports the Park Service's need to implement a plan that is consistent with the park service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for over-snow or other vehicles, those regulations would certainly apply to the 3 park units.

COMMENT:

I would suggest you consider Revised Alternative E which would include: 1) require the sale of only bio-based fuels in the Parks beginning with the 2001-2002 season; 2) establish an interim visitor carrying capacity based on the past 7-year use patterns. This would address overcrowding and trail maintenance; 3) close the parks from 10 p.m. to 6 a.m. to protect wildlife and promote safety; 4) implementation of the EPA's emission standards when they are developed; and 5) development of new sound requirements for all over-snow vehicles.

RESPONSE:

Revised Alternative E is not an alternative considered specifically in the DEIS. Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repackage Revised Alternative E as a separate alternative in the FEIS. Features that are expressed as part of Revised Alternative E are for the most part considered throughout the range of DEIS alternatives and are available for consideration in the final decision.

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. These features of Revised Alternative E are present in the range of alternatives that must be considered by the decision maker before making a final decision. See the section "Alternatives Suggested during the Public Comment Period" located in Chapter II of the FEIS, which presents a comparison of Revised Alternative E with FEIS alternatives. The decision maker will express her or his rationale for the selection in the Record

FORM LETTER 25

Decision to be published 30 days after the FEIS is available. The rationale must, by law, weigh the degree to which an alternative or a particular feature meets the purpose and need for action.

COMMENT:

In short, I support good science being applied to the Parks. As a snowmobiler, I have always felt it is important to protect our environment. By giving serious consideration to Revised Alternative E, I am sure you will agree that, using good science will continue to allow the NPS to protect the Parks for the future and also allow reasonable winter use.

RESPONSE:

The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible information and has used it where appropriate. An EIS is not, per se, a scientific document. CEQ regulations (40 CFR §1502.22) allow the use of the best available information and techniques to support an analysis where data is incomplete or unavailable. It is the Park Service's impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and available as choices for the decision maker.

Received

NOV 02 1999

YELLOWSTONE WINTER USE SURVEY

DSC-RP

As part of Alternative Plan B of the Draft Yellowstone Winter Visitor Use Plan, the National Park Service would plow the roads from West Yellowstone to Old Faithful. This would allow visitors to go to Old Faithful by bus or commercial vans; private vehicles would be allowed by reservation only. This 30 mile plowed road would eliminate snowmobiles and snow coach travel for the entire park from West Yellowstone.

Please take a moment to answer the following questions:

1> If these 30 miles were only available to wheeled vehicles, would you come to Yellowstone Park in the winter?

YES

NO

2> The Alternative B plan also recommends regulation of air quality and sound levels that are unattainable. Do you believe the National Park Service should impose their own standards?

YES

NO

3> The EPA is currently developing emission standards for snowmobiles. Do you believe the National Park Service should wait for and use the EPA's emission standards?

YES

NO

Date 10/30/99Printed Name BJ HallSignature BJ HallAddress PO 713City, State, Zip Conrad ID 83112

FORM LETTER 26

COMMENT:

The National Park Service has recently announced alternative B as their preferred Alternative in the Yellowstone Winter Draft Environmental Impact Statement. alternative B would plow the road from West Yellowstone to Old Faithful. This would eliminate snowmobile access from the most popular gate. This would also eliminate snowcoach travel. Winter visitors would be bussed into Old Faithful. A limited number of private automobiles would be allowed by reservation only.

RESPONSE:

This form response is a page from an unofficial survey. It is unknown how the survey was conducted or what its overall results were. Therefore, NPS can respond only to the posed questions by providing some additional context for the issue.

Alternative B will not be the preferred alternative in the FEIS although it remains as a choice for the decision maker along with all other alternatives evaluated. The focus on alternative B as the preferred is no longer appropriate.

COMMENT:

If the road from West Yellowstone was available to busses and a limited number of automobiles, would you come to West Yellowstone?

RESPONSE:

NPS believes that the marketing of West Yellowstone would shift from snowmobile tours into the park to mass transit tours into the park, and that there are many people who would take advantage of this form of access. Snowmobiling would remain a viable pursuit due to the availability of lands for this use outside the park in the West Yellowstone area. Many people who visit the community spend more time on those lands than in the park itself.

COMMENT:

The National Park Service (in alternative B) also recommends a regulation of air quality and sound levels that are not attainable at this time. Do you believe the National Park Service should impose their own standards?

RESPONSE:

NPS has the authority and responsibility to protect park resources and values, among them air quality and the natural soundscape. NPS is reasonably certain that the snowmobile industry has the capability to develop technology that would conform to alternative B limits, but has been unresponsive to date by emphasizing the production and sale of faster, sleeker machines. After publication of the DEIS, industry spokespeople and others have been protesting that we just need to give industry a chance to meet the requirements instead of closing the parks to snowmobiles. NPS understands that technology change-over would require time.

COMMENT:

The EPA is currently developing emission standards for snowmobiles. Do you believe the National Park Service should wait for the EPA's emission standards that will soon be released?

RESPONSE:

NPS has the authority and responsibility under various laws to protect park resources and values, among them air quality. EPA understands and supports the Park Service's need to implement a plan that is consistent with the park service mandate. EPA notes that it is not likely to deal with snowmobile emissions in a regulatory fashion in the near future, so NPS must exercise its authority to protect air resources as required in the Clean Air Act. Should EPA develop more strict regulations for oversnow or other vehicles, those regulations would certainly apply to the 3 park units.

Dear Mr. Hawkes,

appalled by this way of viewing wildlife

We can no longer allow air and noise pollution in our premier national parks, Yellowstone and Grand Teton. Please require all snowmobiles to meet noise and emission standards at least equal to those of automobiles. If over-snow vehicles can't meet those requirements by the winter of 2002-3, we don't want them in the parks at all.

I also support: Mass transit in the Parks in winter; A study to determine the carrying capacity of Yellowstone in winter; Closure of the Continental Divide Snowmobile Trail in Grand Teton Park; Formal elimination of snowmobiling in the Potholes and Jenny Lake areas of Teton Park; Limiting off-trail and backcountry ski and snowshoe use in winter where wildlife need additional protection.

Sincerely,

Julie Randall

4210 Cambridge Ln
Cherry Chase MD
20815

Public Comment Deadline: Nov. 15, 1999

FORM LETTER 27

COMMENT:

We can no longer allow air and noise pollution in our premier national parks, Yellowstone and Grand Teton. Please require all snowmobiles to meet noise and emission standards at least equal to those of automobiles. If oversnow vehicles can't meet those requirements by the winter of 2002-3, we don't want them in the parks at all.

I also support mass transit in the Parks in winter; A study to determine carrying capacity of Yellowstone in winter; Closure of the Continental Divide Snowmobile Trail in Grand Teton Park; Formal elimination of snowmobiling in the Potholes and Jenny Lake areas of Teton Park; Limiting off-trail and backcountry ski and snowshoe use in winter where wildlife need additional protection.

RESPONSE:

The expression of support for various alternative features or objectives is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alterations to the DEIS. The range of alternatives considered in the FEIS remains the same. Alternative G is the preferred alternative in the FEIS and it would meet the objectives contained in this comment.

RECEIVED

NOV 15 1999

DSC-PM

11/4/99

To Whom It May Concern;

I have read your document analyzing seven winter use management alternatives for the parks. After having visited the area in recent years, I agree with **Alternative A—No Action**. Current usage and management practices are adequate.

Sincerely;

Kay Mauk
Davis Mauk
Steve Mauk

FORM LETTER 28**COMMENT:**

After having visited the area in recent years, I agree with alternative A—no action. Current usage and management practices are adequate.

RESPONSE:

The expression of support for an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Expressions of support convey no information that by themselves would be cause for any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. An added note: Although alternative A is within the range of alternatives that must be considered before a final decision is made, it basically represents the condition that has resulted in a need for change. It is likely the decision maker will gauge her or his selection by the degree to which alternatives meet the purpose and need for action.

To: Clifford Hawkes
National Park Service
Denver Service Center
12795 West Alameda Parkway
Lakewood, CO 80228

NOV 0 3 1999

From: Citizens Concerned with Yellowstone National Park Winter Use Alternatives

Mr. Clifford Hawkes,

We are submitting this letter to express our concerns with the Winter Use proposed alternatives for Yellowstone National Park. While several of the alternatives contain excellent proposals and viable alternatives, each of the alternatives (except alternative A) has at least one sticking point that makes acceptability difficult in the least. Alternative A is no action, leave winter use "as is". Alternative B is the Park Service's preferred alternative.

There are three points that cause us the most concern. The first relates to alternative B and concerns the plowing of roads from West Yellowstone to Old Faithful. The West Entrance receives the most use in winter with nearly 33% of all winter visitors using that entrance per the Park Service's survey. Also, per your own survey, "For the entire sample of park visitors, 56.6% preferred the existing policy of grooming for snowmobile use. A total of 13.1% preferred plowing the road and grooming a parallel route for snowmobile use. A total of 6.5% chose closing the route to snowmobiles and allowing ski or snowshoe use only. Another 19.7% chose to allow snowcoach, ski, and snowshoe travel only on this route. The least preferred option was the alternative B proposed action of plowing the road without any parallel trail for snowmobile use, which was supported by 4.2% of respondents." Our question is why would the so-called preferred alternative B deny snowmobile access from West Yellowstone to Old Faithful when 56.6% of respondents favor this groomed snowmobile route and only 4.2% oppose it? The United States is still a Republic that still supports democracy Mr. Hawkes.

The second point is that a close look at several of the alternatives appear to pit one gateway community against another. Several of the alternatives are very similar with the only major difference being which community is denied a snowmobile access to the Park. In preferred alternative B, West Yellowstone is denied. In another alternative, it is the access near Cody, Wyoming and then finally it is Jackson, Wyoming. We view this as an attempt to divide the snowmobiling community as whole in hopes that each community will only look out for its best interest thus pitting one community against the other. This brings to mind an old slogan, "Divide and Conquer". Is it your hope to take out one community one winter use proposal at a time?

The third and final point is that closing the park may lead to closing the surrounding national forest lands and then finally the national forests as a whole, a domino effect so-to-speak. If the entrance at West Yellowstone were closed to snowmobiles, snowmobile traffic in the surrounding forests would increase and may prompt the Forest Service to begin limiting or eliminating snowmobiling altogether. From our viewpoint, this is unacceptable. As tax-paying citizens, we are not to be denied access to the lands that our tax dollars support. Let us remind you that ultimately you draw your paycheck from the tax payers of this country, not the narrow minded and selfish special interest groups that want to severely limit and even deny the public access to its own lands. These lands belong to all of us Mr. Hawkes.

Many of the alternatives propose excellent ideas including a reduction for emissions and noise, which the majority of snowmobilers support. We too want to take care of our environment but we do not want to be shut out of our environment. Let's openly work together in a direction of "wise-use" rather than submit to the selfish, hidden agendas of the environmental special interest groups. We look forward to your response. Thank you for your time.

Ryan P. Mason	208 S 20th Ave., Bozeman, Montana	59718
Corey Bodgley	6103 Shadow Circle, Bozeman, Montana	59715
Wade Auer	3525 Wappato Ct, Bozeman, Montana	59715
Rae Shiner	249 Vigilante Trail, Bozeman, MT	59715

FORM LETTER 29

COMMENT:

While several of the alternatives contain excellent proposals and viable alternatives, each of the alternatives (except alternative A) has at least one sticking point that makes acceptability difficult in the least.

RESPONSE:

Many people who commented did not like the "mix" of features in the DEIS alternatives. These alternatives were formulated to respond to issues, but the decision maker has the discretion to select a different "mix" of features in the final decision as long as the effects of the features were sufficiently analyzed. Therefore, it is unnecessary to repack age any alternatives differently in the FEIS. Alternative B will not be the Park Service preferred alternative in the FEIS.

COMMENT:

There are three points that cause us the most concern. The first relates to alternative B and concerns the plowing of roads from West Yellowstone to Old Faithful. The West Entrance receives the most use in winter with nearly 33% of all winter visitors using that entrance per the Park Service's survey. Also, per your own survey, "for the entire sample of park visitors, 56.6% preferred the existing policy of grooming for snowmobile use. A total of 13.1% preferred plowing the road and grooming a parallel route for snowmobile use. A total of 6.5% chose closing the route to snowmobiles and allowing ski or snowshoe use only. Another 19.7% chose to allow snowcoach, ski, and snowshoe travel only on this route. The least preferred option was the alternative B proposed action of plowing the road without any parallel trail for snowmobile use, which was supported by 4.2% of respondents." Our question is why would the so called preferred alternative B deny snowmobile access from West Yellowstone to Old Faithful when 56.6% of respondents favor this groomed snowmobile route and only 4.2% oppose it?

RESPONSE:

Alternative B was developed to respond to certain issues. See the alternative description in Chapter II of the FEIS. Impacts of the alternative, and supporting information, such as the survey, are disclosed in the DEIS and the FEIS. Based on the assessment of benefits and impacts associated with all alternatives, the decision maker will make a choice in the record of decision (to be published 30 days after the FEIS is available to the public). The decision is not a voting process. By law, NPS has the authority and the responsibility to make a well-reasoned choice based on the EIS and considering public comment. The decision-maker is likely to select the alternative that best meets the purpose and need for action described in Chapter I of the EIS. Alternative B will not be the preferred alternative in the FEIS.

COMMENT: The second point is that a close look at several of the alternatives appears to pit one gateway community against another. Several of the alternatives are very similar with the only major difference being which community is denied snowmobile access to the Park. In preferred alternative B, West Yellowstone is denied. In another alternative, it is the access near Cody, Wyoming and then finally it is Jackson, Wyoming. We view this as an attempt to divide the snowmobiling community as a whole in hopes that each community will only look out for it's best interest thus pitting one community against the other. This brings to mind an old slogan, "Divide and Conquer." Is it your hope to take out one community one winter use proposal at a time?

RESPONSE:

NPS reiterates that the alternatives were formulated as possible ways to address specific winter use issues. These are explained in the alternative descriptions in Chapter II of the FEIS. Naturally, different alternatives might affect different gateways because various road segments have different issues associated with them. In no alternative, except for snowcoach access only in G, is snowmobile access to Yellowstone closed via the south entrance (out of Jackson). Alternative G treats all gateways the same in respect to snowmobile use.

COMMENT:

The third and final point is that closing the park may lead to closing the surrounding national forest lands and then finally the national forests as a whole, a domino effect so-to-speak. If the entrance at West Yellowstone were closed to snowmobiles, snowmobile traffic in the surrounding forests would increase and may prompt the Forest Service to begin limiting or eliminating snowmobiling altogether. From our viewpoint, this is unacceptable.

FORM LETTER 29**RESPONSE:**

National forests are facing many of the same issues being addressed in this EIS. The impacts of all alternatives on adjacent lands, including national forests, are disclosed in the EIS. If management changes on the forests it will not be exclusively due to changes in the parks. The forest service notes that it is at the limit of snowmobile use in many places now. Because of the present availability of open snowmobiling areas in the high country on national forests, there is greater concern with respect to some wildlife species whose habitat is in these areas. However, it does not follow that the forest service will automatically begin to manage differently based on any park service decision. The Forest Service intends to maintain snowmobile use at a level that can be sustained in accordance with forest plans.

COMMENT

As tax-paying citizens, we should not be denied access to the lands that our tax dollars support. Let us remind you that ultimately you draw your paycheck from the taxpayers of this country, not the narrow minded and selfish special interest groups that want to severely limit and even deny the public access to its own lands.

RESPONSE:

NPS points out that a great number of taxpayers commented on the DEIS. Many strongly objected to the presence of snowmobiles. NPS is committed to finding the appropriate level and type of winter use – that level which assures protection of resources for enjoyment by future generations. In a nutshell, this represents the purpose and need for action that frames the analysis in the EIS.

There is no right to access the park, or to use the park, in any way that is demonstrated to have an adverse impact on park resources and values. Recognizing this as an issue, and that the extent, duration and severity of an impact must be determined, NPS has evaluated and disclosed impacts in the EIS. The park service decision maker must consider the full range of alternatives and their impacts as disclosed in the FEIS before making a decision. Note that there is no alternative that closes access to the 3 park units. NPS is aware that the Forest Service is subject to its own legal constraints limiting access for snowmobiles, such as critical wildlife winter habitat and congressionally designated wilderness. Federal agencies receive funds to manage public lands according to their particular mandates, regulations and policies.

INTERNATIONAL LEISURE HOSTS, LTD.

dba Flagg Ranch Resort

October 22, 1999

To All International Leisure Host Stockholders:

RECEIVED

NOV 02 1999

DSC-RP

The National Park Service is proposing some changes for the winter season that could have serious financial results on your investment in International Leisure Hosts. They are studying the possibility of limiting or closing the Park in the winter as a result of a lawsuit filed by an environmental group. A provision being considered which impacts the company most directly would be to discontinue plowing the main highway to Flagg Ranch and instead plow only to Colter Bay, about 15 miles south of Flagg Ranch. If this provision is adopted, it will prevent us from opening the resort during the winter season and will have a drastic negative effect on the value of Flagg Ranch and on your investment in International Leisure Hosts, Ltd.

The Park Service is currently holding public hearings on this as well as requesting written comments until December 1, 1999.

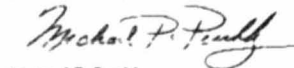
If you agree with us and desire to help please write a short letter in your own words and send it, prior to December 1st, to Clifford Hawkes, National Park Service, 12795 W. Alameda Parkway, Lakewood, CO, 80228 in the stamped self-addressed envelope which we've enclosed. Please try to mention the following:

- 1 You would like the ability to continue seeing all of Yellowstone Park in the winter on a snowmobile.
- 2 The Park should impose reasonable, realistic limitations on snowmobiles to allow them to continue to be used in the Park.
- 3 Not plowing the highway from Colter Bay to Flagg Ranch will have a serious financial impact on the future of Flagg and it makes no sense to duplicate already expensive facilities somewhere else while adding 15 miles to the snowmobile trip.
- 4 You see no advantage to have to travel further to get into the Park from the South entrance and the extra miles the snowmobiles will have to go will add to pollution and runs counter to the purpose of the environmental plan.

If you desire more information, you can also in your letter request a complete copy of the draft environmental impact statement. Thanks for your help

Sincerely,

FLAGG RANCH RESORT



Michael P. Penikly
President

10-29-99
CLIFFORD HAWKES
AS A PARK VISITOR
I AGREE WITH THE ABOVE
REQUEST AS STATED



FORM LETTER 30**COMMENT:**

The National Park Service is proposing some changes for the winter season that could have serious financial results on your investment in International Leisure Hosts. They are studying the possibility of limiting or closing the Park in the winter as a result of a lawsuit filed by an environmental group. A provision being considered which impacts the company most directly would be to discontinue plowing the main highway to Flagg Ranch and instead plow only to Colter Bay, about 15 miles south of Flagg Ranch. If this provision is adopted, it will prevent us from opening the resort during the winter season and will have a drastic negative effect on the value of Flagg Ranch and on your investment in International Leisure Hosts, Ltd. The Park Service is currently holding public hearings on this as well as requesting written comments until December 1, 1999.

If you agree with us and desire to help please write a short letter in your own words and send it, prior to December 1st, to Clifford Hawkes, National Park Service, 12795 W. Alameda Parkway, Lakewood, CO, 80228 in the stamped self-addressed envelope which we've enclosed. Please try to mention the following: 1) You would like the ability to continue seeing all of Yellowstone Park in the winter on a snowmobile; 2) The Park should impose reasonable, realistic limitations on snowmobiles to allow them to continue to be used in the Park; 3) Not plowing the highway from Colter Bay to Flagg Ranch will have a serious financial impact on the future of Flagg and it makes no sense to duplicate already expensive facilities somewhere else while adding 15 miles to the snowmobile trip; 4) You see no advantage to have to travel further to get into the Park from the South entrance and the extra miles the snowmobilers will have to go will add to pollution and runs counter to the purpose of the environmental plan.

RESPONSE:

This form is a letter written by Flagg Ranch Resort to its stockholders, requesting them to write a letter to NPS about winter use. A handwritten note is on the letter expressing agreement with the points listed by Flagg Ranch. This form of correspondence is not technically a comment on the DEIS. NPS can respond only generally to the letter itself.

The letter states that the park service is considering "limiting or closing the park" in the winter (assume Yellowstone is being referred to). No alternative closes the three park units in the winter. All are aimed at providing for use at the current level (pending the completion of a carrying capacity study). One alternative closes the parks to snowmobiles, allowing access via snowcoach only (Flagg Ranch does a significant amount of business using snowcoaches). Nothing in any of the alternatives would prevent Flagg Ranch from opening in the winter; six of the seven alternatives do not change snowmobiling opportunities north from Flagg Ranch into Yellowstone. Operations could be affected by making Flagg ranch accessible only over snow routes. Permit adjustments would need to be negotiated gradually over time with Flagg Ranch, should the final decision include not plowing the highway from Colter Bay to Flagg Ranch. NPS believes that, along with possible changes that would cause Flagg Ranch to adjust its operation, other opportunities and new markets would present themselves.

Received DSC-AR
Architecture

NOV 18 1999



New Mexico Cattle Growers' Association

2231 RIO GRANDE BLVD. N.W. • ALBUQUERQUE, NEW MEXICO 87104
P.O. BOX 7417 • ALBUQUERQUE, NEW MEXICO 87174
TELEPHONE (505) 247-0684 • FAX (505) 842-1750 • E-MAIL NMC GA@R199.COM

November 15, 1999

Clifford Hawkes
National Park Service, Denver Service Center
12795 West Alameda Parkway
Littleton, CO 80228

FAX: (303) 969-2736

RE: Winter Use Plan, Draft Environmental Impact Statement (EIS) for the Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr., Memorial Parkway

Dear Mr. Hawkes:

On behalf of the New Mexico Cattle Growers' Association (NMC GA) and its membership, I am writing to comment on the above-specified document. The NMC GA is strongly opposed to the preferred alternative in this document, or plans made in any other document, which will have a "major negative effect on small gateway communities." If implemented, this alternative will harm families living in rural areas and small towns surrounding the parks. If the economies in these small towns, which depend largely upon tourism, are severely impacted, jobs will be lost. People in these areas will be harmed. Because of the lack of employment, they will have to look elsewhere for jobs and a way to support their families.

We also are concerned about sections in the document discussing snowmobile use. In the preferred alternative, it states that an advisory board will be set up to set noise and pollution emission standards to be implemented in the parks. Snowmobiles that comply with these emission standards will be more costly to own and operate, and many users may not be able to comply, therefore barring many Americans from enjoying their National Parks.

Also discussed are complaints from non-snowmobile users, and the possibility of closing some areas to snowmobiles and only allowing snowshoe traffic. One group of users should not be favored over another. Restricting use in certain areas will satisfy those who complain, but keeps snowmobilers from enjoying their National parks. Many people cannot walk into the park, and depend on snowmobiles to carry them. They would be excluded from enjoying the parks.

We understand the need to manage the park for multiple use, and understand the importance of providing habitat for the wildlife that lives in and around the parks. However, restricting use or closing areas of the park should be a last resort. National Parks were created to protect areas so people would always be able to enjoy them, not keep people out. Thank you in advance for your consideration.

Sincerely,

Caren Cowan
Executive Secretary

BOB FROST, PRESIDENT, San Jose, NM • CAREN COWAN, EXECUTIVE SECRETARY, Albuquerque, NM
JIMMY R. BASON, FIRST VICE PRESIDENT, Hillsboro, NM • PHIL H. BIDEGAR, VICE PRESIDENT, Tucuman, NM
BRUCE DAVIS, VICE PRESIDENT, Santa Fe, NM • DON L. (BRO) LEE, VICE PRESIDENT, Alamogordo, NM
OLIVER (SATCH) LEE, VICE PRESIDENT, Mountain View, NM • R.B. WHITE, SECRETARY/TREASURER, Albuquerque, NM

FORM LETTER 31

COMMENT

The New Mexico Cattle Grower's Association is strongly opposed to the preferred alternative in this document, or plans made in any other document, which will have a "major negative effect on small gateway communities." If implemented, this alternative will harm families living in rural areas and small towns surrounding the parks. If the economies in these small towns, which depend largely upon tourism, are severely impacted jobs will be lost. People in these areas will be harmed. Because of the lack of employment, they will have to look elsewhere for jobs and a way to support their families.

RESPONSE:

The objection to an alternative is of interest to the decision maker when making a final decision. The final decision will be developed following the publication of the FEIS. Objections by themselves convey no information that would require any alteration in the DEIS. The range of alternatives considered in the FEIS remains the same. The decision maker will consider the benefits and the impacts of all the alternatives, including B, before making a decision. The rationale used will be published in the record of decision.

Regarding economic impacts, mixed messages come from states, counties and other jurisdictions. On the one hand, they point out the economic consequences, which in the case of alternative B fall largely on West Yellowstone, Montana. On the other hand, they feel that changes in park management will displace use to adjacent lands in the Greater Yellowstone Area that are already overburdened with snowmobile use, which is increasing annually. NPS believes that these two positions being held simultaneously by state and local governments are inconsistent about potential economic effects of any alternative being considered. NPS has stated with regard to all such speculation that economic impacts not only include losses for current businesses, but also market opportunities for new businesses to begin or current businesses to adapt. NPS holds the optimistic view, based on the response to change over the years, that gateway businesses are and always have been enterprising enough to adapt. The economic consequences shown in the document do not account for replacement use and new markets composed of people who will avail themselves of a new opportunity to visit the parks during the winter.

COMMENT

We also are concerned about sections in the document discussing snowmobile use. In the preferred alternative, it states that an advisory board will be set up to set noise and pollution emission standards to be implemented in the parks. Snowmobiles that comply with these emission standards will be more costly to own and operate, and many users may not be able to comply, therefore barring many Americans from enjoying their National Parks.

RESPONSE:

Concerns about snowmobile emissions are widely held. The other side of the issue is that many people object to the noise and odor of snowmobiles interfering with their expectation of quiet, solitude and clean air in the national park. Arguments have been made that present management favor snowmobile use. Impacts on visitor experience from both sides of the issue are discussed in Chapter IV of the EIS. NPS believes that available recreation experiences should be balanced – the perception of who is favored varies by user group. To this end, six of seven alternatives in the EIS provide for snowmobiling at some level. The nature of fairness or balanced recreation opportunities dictates that absolute freedom on the part of any user group cannot be expected.

FORM LETTER 31**COMMENT:**

We understand the need to manage the park for multiple use, and understand the importance of providing habitat for the wildlife that lives in and around the parks. However restricting use or closing areas of the park should be a last resort. National Parks were created to protect areas so people would always be able to enjoy them, not keep people out.

RESPONSE:

Multiple use is not terminology that is commonly applied to national park mandates, as it is to national forests. The NPS mandate, as discussed in Chapter I and Appendix C in the FEIS, clearly focuses on the protection of resources for purposes of enjoyment by future generations. Closing areas or restricting use may be necessary in order to achieve a sufficient level of protection. It should be reiterated that none of the alternatives close the parks during the winter. Access would be available for anyone who chooses to enjoy the parks – in only one alternative is there no choice as to mode of transport to the interior of YNP. The purpose and need for action articulated in Chapter I includes access to the parks, and for that reason NPS did not consider an alternative that would close them entirely.

THE NATURAL REGULATION ALTERNATIVE**ENDORSEMENT FORM**

The organization listed below endorses The Natural Regulation Alternative as a sensible, scientifically sound, and legally required alternative to restore natural regulation, solitude, and serenity to the winter management of Yellowstone and Grand Teton National Parks and the John D. Rockefeller Memorial Parkway.

Organization: Animal Protection Institute

Address: 2831 Fruitridge Road

City: Sacramento State: CA Zip: 95820

Number of Members/Supporters in Organization: 85,000

Contact Name: Dana Jones Title: Program Director

Signature: 

Each organization endorsing The Natural Regulation Alternative will be identified on an official list provided to the National Park Service at the close of the comment period on the Draft Environmental Impact Statement for Winter Use in Yellowstone and Grand Teton National Parks and the John D. Rockefeller Memorial Parkway. In addition, each endorsement card will be provided to the National Park Service to authenticate the official list.

Please return by November 30, 1999 to the address below:

Michael Markarian, Executive Vice President
The Fund for Animals
8121 Georgia Avenue, Suite 301
Silver Spring, MD 20910-4933
Fax: 301-585-2595

FORM LETTER 32

COMMENT:

The organization listed endorses the Natural Regulation Alternative as a sensible, scientifically sound, and legally required alternative to restore natural regulation, solitude, and serenity to the winter management of Yellowstone and Grand Teton National Parks and the John D. Rockefeller Memorial Parkway.

RESPONSE:

The Natural Regulation Alternative, closure of all 3 park units, has been dismissed as outside the scope and the purpose and need for action. The purpose and need includes effective access to the parks. Closing the parks does not meet the purpose and need. An elevated monorail system is deemed not to be fiscally possible at this time. See FEIS Chapter II, Alternatives Considered and Dismissed from Further Analysis.

The range of alternatives considered in the DEIS and the FEIS is sufficient under NEPA. Complete closure of the park units was considered and dismissed. The Natural Regulation Alternative is not legally required. The comment presents no basis for the assertion that it is required.

NPS policies, supported by the 1990 winter plans for these parks, allow for motorized oversnow use. The issues related to this use have achieved urgency more due to the amount of use than the type of use itself. NPS regulations *do not* prohibit trail grooming or oversnow motorized use. However, they do require that snowmobile use (defined as an ORV) must be found to be consistent with park natural resources and values, safety considerations, et al, and must be limited to designated routes. Similarly, NPS statutes do not outright prohibit snowmobiles, nor do relevant executive orders. Parks that allow snowmobiles have limited them to designated routes. What has been lacking for some park units is an explicit finding, based on environmental analysis, of consistency with statutes, regulations and executive orders. It is the purpose of this EIS and the decision to result from it to make that finding for the parks in question. Within the EIS are analyses of impacts from winter use on wildlife, air and water quality, other recreation users (visitor experience), and a variety of resource elements that corporately relate to the parks as ecosystems. Finally, NPS is not evaluating winter use programs on other federal lands that may be available for snowmobiling; however, the EIS discloses what is known about the current and potential impacts of this use on other federal lands within the Greater Yellowstone Area.

PART III

RESPONSES TO COMMENTS BY SUBJECT TOPIC

ADJACENT LANDS**SUMMARY COMMENT:**

It is our understanding that there are tens of thousands of acres available for use by snowmobiles within a short day's drive from Yellowstone and Grand Teton National Parks. This being the case, the Parks themselves need not attempt to fulfill all the demands for motor-vehicle use. Most of that demand can be met on nearby National Forests which have little enforcement of related regulations. There are also many other places to go around the country instead of the parks.

SUMMARY RESPONSE:

There are areas on adjacent lands that are available for snowmobile use. National forest personnel indicate that snowmobile use is increasing on trails and areas that are available. Such use is not without conflict or the need for regulation, since facilities are at or over capacity especially during peak use times. Changes in park management could potentially exacerbate the conflicts and crowding that presently occur on national forests. See Impacts on Adjacent Lands in both the DEIS and FEIS.

COMMENT:

A comprehensive winter use plan should incorporate all of the winter use opportunities on all of the federal lands within the GYA to more fully and completely plan for public use of these resources.

RESPONSE:

The scope of analysis (range of alternatives) for this EIS is limited to the three national park units. Due primarily to the lawsuit by Fund for Animals and the settlement terms, it was deemed infeasible to expand the scope of analysis to all federal lands in the GYA. Conceptually it would be impossible for NPS to develop alternatives for use on national forest lands without the active involvement of the forest service as a co-lead agency.

SUMMARY COMMENT:

Any ban on snowmobiles must include a comprehensive effort by the NPS to work with federal and state land managers outside the boundaries of the Parks. Such a cooperative effort should make sure that groomed trails especially and snowmobiles use in general are restricted in order to minimize opportunity for illegal access to the Parks and to minimize impacts on adjacent lands.

SUMMARY RESPONSE:

NPS would like to develop and maintain cooperative relationships with other jurisdictions around the parks regardless of the eventual decision. This was certainly the hope when these entities were granted cooperating agency status in this EIS effort. A multi-agency monitoring program would be highly desirable from the Park Service's standpoint.

SUMMARY COMMENT:

Cumulative Impacts Analysis: The disclosure of effects here are inadequate. The "what if" scenarios displayed discuss outcomes which are 180 degrees opposite in effect. It is important to quantify the actual displacement effects of each alternative of both motorized and nonmotorized users to be able to address cumulative effects. No other activities on adjacent National Forests which certainly could contribute to cumulative effects were discussed in this section - such as ongoing land exchanges, timber harvest, bison activities, travel management changes, etc. The only effects discussed were recreation related, and not very quantitative.

ADJACENT LANDS**SUMMARY RESPONSE:**

NPS evaluated the input from other jurisdictions and land managers in the GYA, and it relied heavily on the multi-agency winter use assessment published in final form during March of 1999. The input received from those agencies was reproduced in the adjacent lands section of the DEIS. In the FEIS, the adjacent lands section of Chapter IV includes further discussion of cumulative effects. At FS request, NPS provided a scenario of displaced use based on the recent winter visitor use survey. The scenario is located, along with other related information, in FEIS Appendix J. In providing further input using this information, the FS assessment of impacts on its own lands remains largely unquantified. The adjacent lands impact analysis in the FEIS has been updated to reflect the new input and the displacement scenarios. It can be assumed that the Forest Service does not believe that there is an additive impact to the effects of snowmobiling from other activities such as timber sales or land exchanges. NPS would concur with this assumption, and expresses the primary concern to be one of additive recreation impacts on other resources or values. As indicated in the multi-agency assessment, identified winter use conflicts are mostly a function of snowmobile use which impacts other winter recreation uses and wildlife, or is responsible for crowded trails and trailhead facilities.

SUMMARY COMMENT:

The EIS also does not take into consideration the effect on surrounding Forest Service land. It is mentioned, but no data was provided to determine if it will have an effect on the surrounding area.

SUMMARY RESPONSE:

NPS requested the Forest Service to be a cooperating agency for this purpose. Such information that is provided in both the DEIS and the FEIS with respect to impacts on National Forest lands was provided by the FS. NPS does not by itself have the resource data base or the winter use information for national forests that is necessary to perform such an analysis. NPS holds that, for this programmatic winter use planning effort, the information presented in the EIS sufficiently discloses possible indirect impacts on adjacent lands. The quantification of use displacement, as requested by Forest Service, is based on the best available information but the scenarios are essentially sets of assumptions about something that may or may not happen in the future. Therefore the indirect impacts on adjacent lands remain largely speculative, and neither Forest Service nor NPS can be expected to predict what will happen.

COMMENT:

If the communities surrounding Yellowstone are so dependent on the snowmobile trade, why not create new snowmobile trails adjacent to those communities?

RESPONSE:

All areas that are available for snowmobile use outside of the national parks are being used. Snowmobile programs on lands adjacent to the parks are evaluated annually and in recent years have been subjected to requests for more trails, or wider trails, or upgraded grooming due to increasing use. In other words, many of the issues NPS is dealing with in the parks are also issues with respect to the surround lands.

COMMENT:

What are the effects of the preferred alternative on the surrounding counties' land use plans, policies and controls?

RESPONSE:

This information is in the purview of the counties, as cooperating agencies with special expertise on socio-economic analysis, to provide. The counties are on record as opposing DEIS alternative B on the grounds of economic impacts to surrounding communities, but they have not indicated how this alternative might conflict with existing county plans or policies. NPS is unsure what is meant by "controls". This conclusion is reflected in the FEIS.

COMMENT:

What effects would the preferred alternative have on the 24% of private lands of the Greater Yellowstone Area?

ADJACENT LANDS

RESPONSE:

Neither the counties nor the states, as cooperating agencies, have indicated there could be any impact on private lands within the GYA. In the total body of comment on the DEIS, or from the initial scoping effort, no concerns were raised about potential impacts on private lands. Considering the three park units, there is very little interface with private lands where snowmobiling or other winter uses occur. This conclusion is reflected in the FEIS.

COMMENT:

CEQ Regulations require certain topics to be addressed in every EIS. One of these is possible conflict between proposed actions and land use plans, policies or controls for the area concerned. The EIS uses the Greater Yellowstone Area as its analysis area in many instances. This area is comprised of 24% private lands and 5% state lands, yet the analysis of potential conflicts is lacking.

RESPONSE:

Neither the counties nor the states, as cooperating agencies, have indicated there could be direct or indirect conflicts with existing plans, policies or controls. The Forest Service makes some references to impacts of alternatives on recreation management as it is being implemented under forest plans. These discussions are disclosed in the section for impacts on national forest lands. Since, for the most part, the cooperating agencies expressed no concerns specific to their plans or policies there is nothing in this area to disclose. This conclusion is reflected in the FEIS.

COMMENT:

Closing the park may lead to closing the surrounding national forest lands and then finally the national forests as a whole, a domino effect so-to-speak. If the entrance at West Yellowstone were closed to snowmobiles, snowmobile traffic in the surrounding forests would increase and may prompt the Forest Service to begin limiting or eliminating snowmobiling altogether.

RESPONSE:

See previous comments and responses on impacts to adjacent lands. National forests are subject to many of the same issues that the parks are addressing in this EIS. In the multi-agency winter use assessment (1999), FS indicates the type and severity of issues that exist on those lands. However, forest service mandates are different to some degree, and more opportunities for snowmobiling are available on the forests. In the aforementioned assessment, the FS does not show any intent to limit or close the forests to snowmobiling. FS indicates that it might be necessary to make some management changes in order to maintain a full spectrum of winter opportunities or to protect important winter wildlife habitat.

COMMENT:

The December 1999 issue of SnoWest Magazine, the West's leading publication on snowmobiling, rates West Yellowstone as the West's best. "...it's pretty hard to ride in the West and not be near a mountain range or two. But only one place has Yellowstone National Park in its backyard. This is one of the primary reasons West Yellowstone can make its claim of Snowmobile Capitol of the World." By eliminating snowmobile access at West Yellowstone, alternative B removes the very reason West Yellowstone is the Snowmobile Capitol of the World.

RESPONSE:

Possible impacts on West Yellowstone are disclosed in the DEIS and the FEIS.

COMMENT:

Some commenters expressed the opinion that changes in park management (plowing the road, closing portions of the parks to snowmobiles, or closing the parks entirely to snowmobiles) would have the negative effect of increasing use on other lands in the Greater Yellowstone area. This would include areas of the parks that remain open, or national forest lands, or state lands in Montana. This would crowd or overwhelm other trails.

ADJACENT LANDS

RESPONSE:

The potential for displacing use within the GYA is acknowledged in both the DEIS and the FEIS. Quantified scenarios were developed for the FEIS, and are presented in the Effects on Adjacent Lands section and Appendix J.

AIR QUALITY	
AIR QUALITY - POLLUTED ENVIRONMENT	
General (Air Quality)	
SUMMARY COMMENT:	
A regulation permitting snowmobiles in effect means that snowmobile use is not automatically prohibited. However, the regulation does not mean that snowmobile use MUST be permitted. For example, EPA ambient air quality standards are regularly violated due to excessive emissions from snowmobiles. These air quality standards are definitive benchmarks which have been routinely ignored. Based upon air quality impacts alone, snowmobile use is not consistent with the park's management objectives.	
SUMMARY RESPONSE:	
As noted on page 3 of the DEIS, Executive Order 11644, as amended, provides direction for permitting snowmobile use in national parks in the context of affecting natural values.	
Facts or Data (Air Quality)	
SUMMARY COMMENT:	
There is no proof of impacts on air quality from snowmobile emissions. Much of the air quality information provided in the DEIS was overstated, inaccurate and not true.	
SUMMARY RESPONSE:	
An EIS is not, per se, a scientific analysis. The most recent engineering and scientific data were used in the context of time and resources available. There was no new information supplied in the comment. The results of additional technical analyses (e.g., air dispersion modeling) is to be included in the FEIS.	
SUMMARY COMMENT:	
West Yellowstone is a community heavily dependent on wood stove heat. The air pollution index that was measured could be from other sources.	
SUMMARY RESPONSE:	
Woodstoves are cited as a source of air pollution on pages 107 and 323 of the DEIS, but they are not quantified or geographically identified (e.g., West Yellowstone community).	
COMMENT:	
Some of the methods to collect data on air quality and sound are confusing.	
RESPONSE:	
Methods that were used to collect air quality data will be noted where appropriate in the FEIS to clarify the confusion cited in the comment.	
COMMENT:	
Recent air quality measurements in West Yellowstone revealed carbon monoxide levels that exceed those in polluted cities like Denver.	
RESPONSE:	
Commenter did not supply the source of carbon monoxide measurement data; therefore, comparisons to Denver air quality cannot be made.	

AIR QUALITY

COMMENT:

Snowmobiles also release enormous amounts of pollutants into the air. Two-stroke engines used to power most snowmobiles release 25 to 30% of their fuel/oil mixture directly into the environment. According to a recent NPS study, on a peak day when 2,000 snowmobiles enter the Park, 32 tons (64,000 pounds) of hydrocarbons and 88 tons (176,000 pounds) of carbon monoxide are emitted. Over the course of an entire winter, when more than 60,000 snowmobiles enter the Park, that adds up to 1,200 tons (2,400,000 pounds) of hydrocarbons and 2,400 tons (4,800,000 pounds) of carbon monoxide. During one winter snowmobiles emit 78% of all carbon monoxide and 94% of all hydrocarbons released during the entire year, even though cars and other vehicles vastly outnumber snowmobiles. As a result of snowmobile emissions, federal and state air quality standards have been violated several times in the past. In fact, on Feb. 21, 1995, carbon monoxide levels at the West Entrance to Yellowstone were the highest recorded anywhere in the country on that date. Excessive carbon monoxide at the West Entrance has made Park personnel sick and poses serious health risks to snowmobilers. Snowmobile pollutants which collect in the snow pack many cause deleterious impacts to aquatic species and their habitat upon spring snowmelt.

RESPONSE: The data in the comment appear to come from the October 1993 NPS report titled "Air Quality Concerns Related to Snowmobile Usage in National Parks." This report has been updated (February 2000), and the emission numbers were revised downward. The comment provides no basis for the claim that carbon monoxide levels at the west entrance in February 1995 were the highest in the country on that date.

COMMENT:

What is the current funding level for air and water monitoring? Are they going up or down? What have the funding requests been for air and water monitoring for the past ten years?

RESPONSE:

Air quality monitoring activities are described on page 109 of the DEIS. The park does not specifically track funding for air monitoring as an individual budget line item.

SUMMARY COMMENT:

There is extensive evidence that snowmobiles produce more smog pollution than modern automobiles. Every weekend in Yellowstone, snowmobiles at Old Faithful alone create more than a year's worth of park-wide automobile pollution.

SUMMARY RESPONSE:

Data in NPS report titled "Air Quality Concerns Related to Snowmobile Usage in National Parks" indicate some opposite conclusions. For example, annual carbon monoxide emissions from automobiles exceed annual carbon monoxide from snowmobiles.

COMMENT:

Page 108, sentence 4: The method described for an area to become non-attainment for CO is incorrect. The CO standard is not to be exceeded more than once in a one-year period. This is for both federal and state 1-hour and 8-hour average standards.

RESPONSE:

The sentence on page 108 about nonattainment will be changed in the FEIS.

COMMENT:

Page 108, Table 14, Montana Mean hourly average for NOx is incorrect. It should be 0.3 PPM instead of 0.03 PPM. Also "PM25" should be PM2.5. PM2.5 should be discussed in paragraph two with the other pollutants.

RESPONSE:

The Montana hourly nitrogen dioxide standard will be changed to 0.3 parts per million. PM2.5 also will be changed to PM2.5.

AIR QUALITY

COMMENT:

Air Quality Monitoring - Page 109, second paragraph: This paragraph should be broken into two paragraphs because two different types of monitoring are being reported.

RESPONSE:

The last sentence of the second paragraph on Air Quality Monitoring will be moved to the end of the next paragraph.

COMMENT:

I would like to bring your attention that numerous statements made throughout the document that cite carbon monoxide (CO) ambient air quality standards violations, or exceedances, are incorrect and should be deleted. Non-reference method sampling and analysis methodology (eg., CO bag sampling) cannot be used to determine compliances with National or state ambient air quality standards.

RESPONSE:

References to standard exceedances will be removed where non-reference methods were used.

COMMENT:

Page 108, 2nd paragraph: "The method described in this sentence for an area to become non-attainment for CO is incorrect. The CO standard is not to be exceeded more than once in a one-year period. This is for both federal and state 1-hour and 8-hour CO ambient air quality standards. Page 108, Table 14: "A portion of this table is incorrect. The State of Wyoming has not yet adopted the new PM2.5 national ambient air quality standards. Page 109, 4th paragraph: "Please specify the sampling method used in the collection of these concentrations. Page 109, last paragraph: "Information at four NADP sites within and near Bridger-Eton NF is readily available at the following website <http://nadp.sws.uiuc.edu/nadpdata/>. Page 161, 4th paragraph: "... will be exposed to air pollutant emissions that violate the NAAQS and state air quality standards for Idaho, Montana, and Wyoming." See comment A. Page 164, 3rd paragraph: "...often experience problems with air quality." What "problems" are being referenced in this sentence? Please be specific. Page 164, 3rd paragraph, 4th sentence: "...concentrations of carbon monoxide that exceeded air quality standards for the EPA..." See Comment A. Page 165, 1st paragraph: "When information from current research and more detailed studies are incorporated into the Final EIS, please make sure that the information is sited correctly when referencing compliance with National or state ambient air quality standards. Page 181: "...pollutant levels reaching or exceeding EPA air quality standards have occurred..." See Comment A.

RESPONSE:

Page 108, 2nd paragraph - The sentence on page 108 about non-attainment will be changed in the FEIS.

Page 108, Table 14 - FEIS will clarify status of PM2.5 standard.

Page 109, 4th paragraph - FEIS will clarify data methods.

Page 109, last paragraph - Available data will be reviewed for applicability.

Page 161, 4th paragraph, Page 164, 3rd paragraph, Page 165, 1st paragraph, Page 181 - FEIS will clarify references to compliance with National Ambient Air Quality Standards.

Page 164, 3rd paragraph - Any cited "problems" will be clarified.

COMMENT:

Page 182, 1st paragraph: "...air quality violations recorded there." See Comment A. Page 202, "...possibility of violation of the NAAQS and state air quality standards due to snowmobile emissions would likely be eliminated." See Comment A. Page 208: "...potentially exceeding EPA air quality standards in some locations." See Comment A. Page 231, "...to improve protection designation as a Class I clean air area." This statement is incorrect. Yellowstone National Park and Grand Teton National Park were established as Mandatory Class I Federal Areas (44 CFR 69124, November 30, 1979) and may not be redesignated.

AIR QUALITY

Please revise this sentence by deleting the words "Class I." Page 246: "...possibility of violation of the NAAQS and state air quality standards due to snowmobile emissions would likely be eliminated." See Comment A. Page 263: "What would constitute an "adverse impact"? What type of monitoring would be used to determine if an "adverse impact" is occurring? Page 275, 2nd to last paragraph: "...possibility of violation of the NAAQS and state air quality standards would likely be eliminated." See comment A. Page 278, 3rd full paragraph: "...protect YNP's designation as a Class I clean air area..." This statement is incorrect. Yellowstone National Park and Grand Teton National park were established as mandatory Class I Federal Areas and may not be redesignated. Please revise this sentence by deleting the words "Class I."

RESPONSE:

Page 162, 1st paragraph, Page 202, Page 208, Page 246, Page 275 - FEIS will clarify references to compliance with National Ambient Air Quality Standards. Page 231, Page 278 - Class I statement will be revised. Page 263 - "Adverse impact" is defined in Table 34, page 158. No specific monitoring is identified to date.

COMMENT:

The statement about the air quality of the West Entrance of Yellowstone is being disputed by the Montana DEQ. I just felt like you might rethink stating the results as fact when it is not.

RESPONSE:

Available air quality data for West Yellowstone are under review.

New Information (Air Quality)

COMMENTS:

"Do you feel that air quality standards should be set by forthcoming rules of the EPA?" 375 said yes. 43 said no.

"Do you agree that YNP should set its own air quality and sound level standards?" Seven said yes. 411 said no.

SUMMARY RESPONSE:

Ambient air quality standards, which are totally different than mobile source emission standards, are set by the U.S. EPA.

COMMENT:

In fact, levels of carbon monoxide measured between West Yellowstone and Madison junction during 1996 were significantly higher than the highest levels of carbon monoxide measured anywhere in the United States during 1995.

RESPONSE:

The comment provides no data or other basis for the comment's claim that carbon monoxide levels at the west entrance in 1995 were highest in the country on that date.

COMMENT:

A recent NPS report on snowmobiles' impact on air quality found that despite being outnumbered by other vehicles 16 to 1, automobiles emit 100 times more carbon monoxide and 300 times more hydrocarbon than modern snowmobiles.

RESPONSE:

The recent NPS report cited in the comment was not identified. The NPS report, "Air Quality Concerns Related to Snowmobile Usage in National Parks" indicates that automobiles emit less than half the amount of hydrocarbons than snowmobiles and about 15 times less carbon monoxide.

SUMMARY COMMENT:

Two-stroke engines discharge 25-30% of their fuel mixture, unburned, directly into the environment. Unburned fuel contains many toxic compounds including benzene, toluene, xylene, and the extremely persistent suspected human carcinogen MTBE. Two-strokes are one of the largest unchecked sources of pollution nationwide. These engines create dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, ozone, particulate matter, aldehydes, 1,3 butadiene, benzenes, and extremely persistent polycyclic UV aromatic hydrocarbons (PAH). Several of these compounds are listed as "known" or "probable" human carcinogens by EPA. Benzene, for instance, is a "known" human carcinogen. And several aldehydes including butadiene are classified as "probable human carcinogens." All are believed to cause deleterious health effects in humans and animals well short of fatal doses (EPA 1993).

SUMMARY RESPONSE:

DEIS acknowledges that emissions associated with two-stroke engines are relatively high compared to four-stroke engines.

COMMENT:

During the winter of 1998-9 Yellowstone saw 63,000 snowmobiles enter the park, with nearly 54,000 visitors traveling on the corridor between West Yellowstone and Old Faithful (Flores and Maniero, 1999).

RESPONSE:

Snowmobile use figures for 1998-99 are consistent with NPS data.

COMMENT:

Page 107, last paragraph: The paragraph does not identify any other pollution sources in the Park. It should show other sources of pollution inside the Park that would include propane and oil heaters in visitor centers, hotels, restaurants, and maintenance facilities.

RESPONSE:

Woodstoves are cited as air pollution sources on page 107 of the DEIS.

COMMENT:

The results of the carbon monoxide monitoring done by DEQ during the winter of 1998-99 near the West Entrance could be used. The highest 8-hour average recorded was 8.9 PPM CO on February 13. The peak 1-hour concentration was 18.1 on the evening (5-6 PM) February 13, 1999. The summary has been available from Montana DEQ since April and a copy was sent to NPS in May of this year.

RESPONSE:

The Montana DEQ 1998-99 air monitoring data has been requested repeatedly, but it has not been received.

COMMENT:

This may also be the appropriate location to summarize "Other Air Sampling Studies" to determine personal exposure of employees (Kado et al. 1999), measure the impacts of ethanol blend fuel using remote sensing of tailpipe emissions (Bishop, Stedman, Morris, 1998 and 1999), and work to identify particulate and aerosol composition (Carroll and White 1999, and Peterson and Tyler, 1999). Montana DEQ will assist in drafting or reviewing this section at the request of NPS.

RESPONSE:

Several studies are under review.

Summer Air Quality**SUMMARY COMMENT:**

Its difficult to comprehend how the use of snowmobiles in the park can create more emissions than summer traffic.

AIR QUALITY

DEPARTMENT OF TRANSPORTATION

The DEIS report titled "Air Quality Concerns Related to Snowmobile Access at National Park" provides estimated annual emissions by vehicle type. Non-winter emissions are generated by automobiles, RVs, and trucks, while winter emissions are generated by snowmobiles and snowcoaches only.

COMMENT:

Is summer and winter traffic monitored for emissions and sound?

RESPONSE:

The Montana Department of Environmental Quality operates a monitoring station for carbon monoxide near the west entrance and a monitoring station for particulates in the town of West Yellowstone.

Clarification (Air Quality)**COMMENT:**

A properly tuned two-stroke engine emits less harmful emissions than an automobile.

RESPONSE:

The comment supplied no data to support the comment that a properly tuned two-stroke engine emits less harmful emissions than an automobile.

COMMENT:

I feel the tests that were taken were not accurate. Cloud cover does affect the tests taken for exhaust.

RESPONSE:

The DEIS identified the best emissions data that were available at that time.

COMMENT:

I would encourage more research on pollutants and how they affect both wildlife and the general ecological balance of the floral and fauna.

RESPONSE:

More research on pollutant impacts on flora and fauna is always desirable, but is not necessary for the purposes of this EIS and the programmatic decision to be made.

COMMENT:

The park is probably in violation of clean air standards right now, the CAA and also standards for Class 2 air shed.

RESPONSE:

NP is a Class I area and no violations of national ambient air quality standards exist.

COMMENT:

The section on Air Quality Monitoring includes the sentence, "Few conclusive studies exist to help develop informed decisions to reduce the health and environment concerns caused by winter transportation." Where does the DEIS determine, specifically, that there are health and environment concerns caused by winter transportation?

RESPONSE:

The DEIS cites over a 100 winter complaints letters received in 1993-94 relating to snowmobile emissions and the results of preliminary carbon monoxide monitoring conducted in 1994 that raised health concerns.

AIR QUALITY

COMMENT:

Page 109, Air Quality Monitoring, second paragraph: The last two sentences "Snowpack samples from ... attributed to regional sources...." is correct and should be referenced to Ingersoll, 1999. This, however, is not air quality monitoring but water quality sampling, and an expanded paragraph with a separate heading is needed to summarize the rest of Ingersoll's work. The paragraph also could point out that increases of most hydrocarbons were proportional to increased snowmobile use levels. The exceptions were MTBE and toluene.

RESPONSE:

The last sentence of the paragraph on Air Quality Monitoring will be moved to the end of the next paragraph. The 1999 Ingersoll work cited in the comment was not available for the DCEIS.

COMMENTS:

Page xiii, Table S-2-air quality: "may affect designation as a Class I clean air area" ... improve protection designation as a Class I clean air area" These statements are incorrect. Yellowstone National Park and Grand Teton national Park were established as Mandatory Class I Federal Areas (44 CFR 69124, November 30, 1979) and may not be redesignated. Please revise both of these sentences by deleting the words "Class I."

Page 45, Table 4-air quality: These statements are incorrect. Yellowstone National Park and Grand Teton National Park were established as Mandatory Class I Federal Areas (44 CFR 69124, November 30, 1979) and may not be redesignated. Please revise both of these sentences by deleting the words "Class I."

REMARKS RESPONSE:

The statements about the Class I area will be revised.

SUMMARY COMMENT:

Pages 93 and 94, clarify references to air quality standards for carbon monoxide and any standards that may have been exceeded.

REMARKS RESPONSE:

Pages 93 and 94 clarify references to compliance with National Ambient Air Quality Standards for carbon monoxide.

COMMENT:

Page 94. "Table 9" should be "Table 10".

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COMMENT:

Page 94 & 95: "Please footnote the sampling method used in the collection of these concentrations. Page 95, 4th paragraph: "Violation of national standards did not appear..." See Comment A. Page 95, 2nd to last paragraph: "The Air Quality Division disagrees with the interpretation in this paragraph. The ambient air quality standards are designed to safeguard all of the population from infants to the elderly, not just highways. The ambient air quality standards were developed with corresponding monitoring methodologies and siting criteria. Reference method carbon monoxide (CO) monitors are to be sited at locations where CO levels would be expected to be the highest, and at locations where air flow is not restricted or affected by physical structures. Page 95, last paragraph, 1st sentence: "...no NAAQS violations occurred..." See Comment A. Page 95, last paragraph, 4th sentence: "Concentrations here exceeded levels established by the government to protect public health ..." See comment A. Page 107: "This sentence fails to mention any local point sources (e.g., propane and oil heaters, generators) that operate within YNP, GTNP, and the Parkway. Please revise this sentence to include any local point sources within YNP, GTNP, and The Parkway. Page 107: "What is meant by "ambient sources" of pollution in this sentence? If the sentence is in reference to anthropogenic (man-made) sources please use the correct terminology and substitute "anthropogenic" for "ambient."

AIR QUALITY

RESPONSE:

DEIS will clearly reference its compliance with National Ambient Air Quality Standards for carbon monoxide. Weaknesses are cited as air pollution sources on page 106 of the DEIS. Ambient sources: "wildfire, road, and other sources with potential."

AIR QUALITY - ENVIRONMENTAL CONSEQUENCES

Analysis (Air Quality)

COMMENT:

It [the DEIS] fails to comprehensively evaluate the impacts of snowmobile use on park wildlife (including threatened and endangered species), air and water quality, vegetation, serenity and solitude, ecology, parks habitats (particularly fragile geothermal areas), and non-motorized users.

RESPONSE:

The DEIS summarizes the impacts of motorist recreation on park values, such as air quality, in Chapter IV, Environmental Consequences.

COMMENT:

Nor did it [the DEIS] properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

RESPONSE:

Cumulative air quality impacts are discussed in the DEIS on pages 322-323. It is acknowledged that little, if anything, is known about impacts of summer and traffic on winter conditions and vice versa.

COMMENT:

Discrepancy in figures for gas used.

RESPONSE:

In park gasoline consumption estimates are not parameters that are used in previous and ongoing air quality studies.

COMMENTS:

What will be the associated impacts from the addition of cars, 4-wheel drives, trucks and snowcoaches? What analysis is there of this within the DEIS?

PRIMARY RESPONSE:

The DEIS will contain an analysis of automobile emissions generated by traffic on plowed roads from the West Entrance to Old Faithful in lieu of over-snow vehicles (alternatives B and C).

COMMENT:

Comparing emission readings in the park to Los Angeles freeways without using the same timeframe (4hr avg. vs. 24hr avg.) [misrepresents the facts].

RESPONSE:

No comparisons to Los Angeles freeways were made in the DEIS.

COMMENT:

Stating particulate emissions in pounds rather than in .001 of a pound [misrepresents the facts].

RESPONSE:

Emissions from vehicles are generally expressed in terms of grams per mile, which is expressed as pounds per 1000 ft. of vehicles operating in the same general area are expressed in terms of pounds per a time period of 1000 ft. (e.g., 1000 ft. per mile) and in tons. The selection of appropriate, significant digits and number of decimal places is determined by the sources' method of measurement and analysis, as well as the degree of accuracy of the analysis.

AIR QUALITY

COMMENT:

You propose to wait 10 years to bring air quality up to standard?

RESPONSE:

The park is located in an area that is currently in attainment for the carbon monoxide and particulate matter National Ambient Air Quality Standards. Mitigation measures that include a phase-in period or first depend on the results of an advisory committee will limit short-term consequences as indicated in the effects analysis. It will be up to the decision maker to determine whether these consequences are acceptable as affecting such factors. Where effects clearly violate laws or regulations, managers must act to mitigate or eliminate the impact.

COMMENT:

What are the pollution impact snowplows and busses will have on the Park?

RESPONSE:

The FEIS will have an air quality analysis of increased snowcoaches displacing snowmobiles.

COMMENT:

Having rode through Yellowstone last year I saw how testing stations were positioned. Which happened to be where the majority of snowmobiles sat and idled for extended periods of time which provides more inaccurate information.

RESPONSE:

Researchers of past air monitoring studies selected monitoring locations based on the objectives of their study.

COMMENT:

Transferring the noise and pollution to these three entrances [north, south, and east] will most likely increase noise and pollution in the park as a whole.

RESPONSE:

The basis of the comment is unknown since the DEIS does not propose to transfer emissions to entrance stations.

COMMENT:

I don't believe some of the impacts of your suggested plan has taken into consideration exhaust fumes produced by the busses during the winter while idling at the geyser.

RESPONSE:

The FEIS will have an air quality analysis of 1) increased snowcoaches displacing snowmobiles, and 2) snowmobiles and vans displacing snowmobiles traveling to Old Faithful in the winter.

COMMENT:

Would like to see the emission test and who conducted the test and what the benefits would be to the closing of the park.

RESPONSE:

Details of emission and air monitoring studies can be found in the references cited in the Bibliography section of the DEIS. The DEIS does not propose closing the park. The FEIS will report on an analysis of a scenario prohibiting snowmobile travel to Old Faithful.

COMMENT:

There is no guarantee that the air quality and noise reduction benefits associated with the imposition of these very modest standards will not be outweighed by increases in the number of motorized machines using the parks.

AIR QUALITY

RESPONSE:

"Highest standard" is not defined in the comment, the DEIS does not speculate on "what if" scenarios.

COMMENT:

Leaving the mistaken impression that Yellowstone air quality is worse than one of America's dirtiest cities.

RESPONSE:

The DEIS makes no comparative statement regarding air quality in YNP vis-à-vis urban cities.

COMMENT:

On page 481 of your draft document, you state that all alternatives present the potential for impacts, including those on air quality, which are "short-term (for the duration of the causal factor) and minor." You have provided no science to support your claim that these potential impacts are either short-term or minor.

RESPONSE:

Short-term is defined in Table 34, page 158, and "minor" is defined in Table 36, page 161.

COMMENT:

On page 235 of your draft, you discuss the impacts of snowmobile emissions on air quality in the park. On that same page, you omit data on the negative impacts of a potential increase in tour bus and vehicle emissions in the area between the West Entrance and Old Faithful. Nor do you discuss the potential, positive impacts that "clean, green" snowmobiles would pose in this equation. This is a notable omission.

RESPONSE:

The DEIS will have an air quality analysis of (1) increased snowcoaches displacing snowmobiles and automobiles and vans displacing snowmobiles traveling to Old Faithful in the winter. The comment does not define a "clean, green" snowmobile. If a clean, green snowmobile is interpreted to be an electric snowmobile, then alternative C in the DEIS approximates this scenario.

COMMENT:

The preferred alternative B fails to recommend several easy ways to mitigate emission problems associated with backed up traffic at the West Entrance such as the advanced sale of passes at outlets in West Yellowstone or through outfitters. There is no analysis of how the significant emissions from diesel buses that overnight at Old Faithful will affect air quality.

RESPONSE:

Advanced sale of passes outside YNP may mitigate some emissions due to queuing at the West Entrance, but does not mitigate emissions at other staging areas. The DEIS does not envision large numbers of diesel buses overnighing at Old Faithful.

COMMENT:

Yet on pages 15 and 16 of the air quality concerns related to snowmobile usage mentioned above you use year around traffic values to compare snowmobile contributions to winter pollution. By your own sanctioned studies, you have included all visitors to the park to use in decision making but have chosen to ignore any other input that relates to this pollution problem.

RESPONSE:

The comment is unclear. It is acknowledged that little, if anything, is known about impacts of summer auto traffic on winter conditions and vice versa.

AIR QUALITY

COMMENT:

Air quality impacts of diesel or other wheeled motor vehicles under the preferred alternative are absent from any analysis.

RESPONSE:

The DEIS will contain results of an dispersion modeling analysis of impacts of diesel and other wheeled motor vehicles.

COMMENT:

The report is on "air quality impacts of snowmobiles. How does a comparison of snowmobile emissions to an incomplete emissions inventory benefit the understanding of these emissions' impacts and management of these impacts? What is needed is some monitoring method to enable an individual NPS unit to define any snowmobile impacts. The University of Denver is developing one such tool, but this is not indicated in this report. Another tool NPS managers could request from OSHA would be pollutant monitors for areas where staff must work. Such monitoring would help determine public health and occupational exposure concerns would occur wherever there is snowmobile congestion. Such studies might show the need for expensive air quality monitoring of a specific to a location, but it would not mean the entire park unit has an air quality problem." See Montana DEQ Comments.

RESPONSE:

In one measurement of carbon monoxide and hydrocarbon emissions from snowmobiles have been conducted by University of Denver researchers (see DEIS bibliography listing for Bishop and Mackman). For example, a study of driver exposure to carbon monoxide while traveling in the wake of a snowmobile was conducted (see DEIS bibliography listing for Bishop and Davis, 1997). Some results of these studies are presented in the DEIS (pp. 32-36). An employee can't monitor the exposure study was conducted at the wind entrance station in 1997 (see Radaba, T. June 1997, Industrial Hygiene Consultation Report, U.S. Department of the Interior).

COMMENT:

Nowhere in your report did you account for wind currents and smog being generated from neighboring states.

RESPONSE:

Air sources outside the park are discussed in Chapter III, affected environment (page 107) and in Appendix B of Volume II of the DEIS.

COMMENT:

Yet, the impact of air pollution on flora and fauna is not addressed.

RESPONSE:

In general, the impact of air pollution on flora and fauna has been investigated for decades and resulted in the establishment of federal, Wyoming, and Montana secondary (welfare-based) ambient air quality standards.

COMMENT:

Because of (1) increased snowmobile use, (2) the amount of harmful pollutants, and (3) because snowmobiles are unregulated, the Park Service must mitigate or eliminate impacts to air quality. Currently there exists no means to mitigate these effects. Fortunately, the means to eliminate them does exist. Snowcoaches currently used in the GYA use four-stroke engines providing oversnow access. Converting winter recreational transportation in YNP and GTNP and the Parkway would accomplish the desired conditions the park service seeks in the planning process, those being air quality, noise reduction and reduction in vehicle numbers.

COMMENT:

Page 323, paragraph 2, sentence four: "...EPA proposed regulations..." This section should also identify that existing regulations may impact alternatives in this DEIS. For example, if ambient air quality levels exceeded standards at the West Entrance, plans to correct the situation will be developed and implemented.

AIR QUALITY**REMARKS RESPONSE:**

The NPS is aware of regulations that impact the DEIS alternatives. There is no current or planned air monitoring station at the West Entrance.

COMMENT:

Staging areas at Old Faithful and Madison will only move the snowmobile pollution problems of West Yellowstone to inside the park.

RESPONSE:

An analysis of air quality at the West Entrance and staging areas at Old Faithful and Flagg Ranch for the various alternatives will be included in the FEIS.

COMMENT:

Section 169(A)(a)(1) of the Clean Air Act (The Act) states that "Congress hereby declares as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Class I Federal areas which impairment results from manmade air pollution. This DEIS describes man-made impairments to both air quality and visibility from winter use in the project area. The Act specifically delegates the responsibility to protect air quality and related values (visibility, odor) in Class I areas to the Federal Land Manager.

RESPONSE:

A summary of the NPS mandates, including provisions of the Clean Air Act to provide for an affirmative responsibility to protect air quality related values, is provided in Chapter I Purpose of and Need for the Action of the DEIS (pages 2-3).

SUMMARY COMMENT:

The pollution created by vans or buses will be far greater than any snowmobiles.

SUMMARY RESPONSE:

The FEIS will contain an analysis of air quality associated with mass transit (snowcoaches and wheeled buses) utilizing in West Yellowstone compared to current snowmobile use.

COMMENT:

I've also been choked by diesel fumes from large RVs in the park - is this pollution source being evaluated as well?

RESPONSE:

Emissions from recreational vehicles are not being investigated specifically. However, air quality analyses that have been undertaken include alternatives that include diesel buses, which can be deemed representative of large recreational vehicles.

COMMENT:

A cold starting engine is not as efficient, and should not be considered as the base.

RESPONSE:

Cold starts generate higher levels of carbon monoxide, particularly in cold climates such as those at Yellowstone in the winter.

COMMENT:

If the NPS is going to consider the economic impacts of its proposed alternatives, then this must include an analysis of the economic costs of continuing to permit snowmobiles in the Parks including the cost of pollution, the killing of bison outside the Park, and the cost to the Park's ecology from continued degradation.

RESPONSE:

The DEIS does not have to address indirect costs associated with impacts that cannot be quantified.

AIR QUALITY

COMMENT:

The DEIS failed to adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability on its beleaguered bison population, on predator/prey dynamics of coyotes and wolves, on critical but fragile thermally influenced habitat and vegetation, nor did it properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

RESPONSE:

A discussion of Wildlife and Threatened and Endangered species and Systems of Concern is provided in the Affected Environment (Chapter III pp. 130-137) and Environmental Consequences (Chapter IV pp. 163-170) sections of the DEIS. Effects to impacts for each alternative also are provided in the impacts section for each alternative in Chapter IV. Without further information, we are unable to address the concern about failure to "adequately and comprehensively evaluate." An EIS is not per se a scientific analysis. It is intended to disclose environmental effects over a range of alternatives, in which the analyses must demonstrate scientific integrity by disclosing methods and making explicit references to sources used (40 CFR 1502.24). The DEIS does this.

Assumptions in Analysis (Air Quality)**COMMENT:**

Plowing the road would be done with large diesel powered snow blowers and blades-does this not also pollute the atmosphere, both with pollutants and noise?

RESPONSE:

Diesel powered snow removal equipment also releases air emissions. However, the number of pieces of this equipment and operating hours are small relative to current levels of snowmobile use.

COMMENT:

At a minimum, the entire park and environs must meet Class I air standards.

RESPONSE:

There are no numerical Class I air standards.

COMMENT:

In chapter two under alternative B there is talk of air quality and oversnow motor vehicle sound would be addressed through an advisory committee that would make recommendations on the phasing and implementation of sound and emission standards over the next 10 years. Why over 10 years why not start as soon as you introduce the snowmobiles in to the park.

RESPONSE:

Snowmobiles are already operating in the park, and it takes time to introduce cleaner technology into the commercial marketplace. For example, historically it has taken several decades to turn over the general population automotive fleet to realize the benefits of less polluting automobiles.

COMMENT:

The emission standards might very well be adequate for today's population, but with that number growing each year, it is possible that the standards you set for today will not be adequate for tomorrow.

RESPONSE:

The future cannot be predicted, but trends can be observed. For example, over the last decade, visitation to large national parks such as Yellowstone has generally risen, but limitations such as infrastructure size eventually influence its capacity to accommodate increasing numbers of visitors and vehicles.

AIR QUALITY

SUMMARY COMMENT:

If the road were plowed, all of the cars and buses would generate pollution in addition to any groomers, snowcoaches, and snowmobiles.

RESPONSE:

Air quality analyses conducted for the FEIS will include emissions from all vehicles which use will be included in the FEIS.

COMMENT:

City buses pollute more than snow-cats.

RESPONSE:

There is extensive data on bus engine emissions, which have been regulated by the EPA for many years, and very few data on engine emissions from snowmobiles, which are not regulated by the EPA. Therefore, statistical comparisons cannot be made at this time.

Clarification (Air Quality)**COMMENTS:**

Is it true that at the West Entrance, the Park Service has been forced to pump fresh air into ranger booths to protect the lungs of employees?

SUMMARY RESPONSE:

Positive ventilation systems were installed in the fee collection buildings as a preventative measure to limit occupational exposure to various pollutants.

COMMENT:

In different proposed alternatives (that were not preferred) emissions standards were set at a higher level, yet disregarded. While any increase in environmental and emissions standards will be beneficial to the GYA, the highest of standards must be upheld in preserved lands to most benefit the National Park System.

RESPONSE:

Higher emissions reductions from snowmobiles are discussed in alternative B, the Preferred Alternative of the FEIS, and alternative D, and the cited reductions are the same for each alternative.

COMMENT:

Is it true that at the West Yellowstone entrance, the Park Service has been forced to pump fresh air into ranger booths to protect the lungs of employees? Is it correct that at Old Faithful, snowmobiles emit more pollution in a single weekend than automobiles do in an entire year?

RESPONSE:

Snowmobiles do not emit more pollutants in a weekend than automobiles do in a year.

COMMENT:

Several alternatives to address air quality are ignored.

RESPONSE:

The company did not identify any suggested alternatives.

COMMENT:

What about the pollution from the backed up line of cars?

RESPONSE:

Additional air quality analysis conducted for the FEIS will account for queues by automobiles and snowmobiles at entry points.

AIR QUALITY

COMMENT:

For example, Minnesota, Iowa, and several other states require the use of ethanol blend year-round. The report would be of better use to decision makers if these items were specified, or if NPS units were given guidance on who to contact to determine if oxygenates are required in an area.

RESPONSE:

NPS is aware of emission test data from vehicles, including snowmobiles, operating on ethanolated fuels.

COMMENT:

"Page 6, Clean Air Act Designations- NPS should list (in a table or appendix) the NPS units that include Class I airsheds and use snowmobiles. As written, the paragraph implies that all 48 Class I NPS units are in danger of air quality problems from snowmobiles, and this is not the case." See Montana DEQ Comments.

RESPONSE:

In its April 25, 2000 press release, the NPS announced its ban on the recreational use of snowmobiles in 27 park units, including 10 parks in Class I areas. The paragraph will be rewritten as suggested.

COMMENT:

Page 164, after sentence 2: The reader would be better prepared to make an informed decision about the alternatives if the status of these regulations was discussed. A draft regulation is due in September 2000, and it will take some time to become final. There will probably be a phase-in of the regulations. In other words, EPA regulations may help the situation in the 2006 to 2008 time frame.

RESPONSE:

The information on EPA's proposed rulemaking on snowmobile emission standards includes a reference to the *Federal Register* citation, which should be consulted for details.

COMMENT:

Page 230, second paragraph, last sentence: This sentence does not appear to reflect that alternative C requires ethanol blend and low emission lube oils. Under alternative C (Table S-1, S-2), a snowmobile not using these products (producing lower emissions) would be turned away from the park. Further, most snowmobiles entering from West Yellowstone currently have some amount of ethanol blend fuel. The sentence should either be removed or changed to identify that these fuels and lube oils are used.

RESPONSE:

Although alternative C (as well as alternative D) proposes selling 10 percent ethanol fuel and synthetic low emissions lubricants in the park, this does not ensure that all snowmobiles would operate on these products.

COMMENT:

Page 231, paragraph 2, third sentence: What is meant by "...improve protection designation of Class I Area?" These areas are all designated by statute as Class I areas, and cannot be removed from the list except by Congress.

RESPONSE:

The sentence related to Class I designation will be revised or removed.

COMMENT:

Page 263, last line, "...if monitoring indicates...." What type of monitoring does NPS intend to conduct?

AIR QUALITY	
RESPONSE: No new monitoring is planned by the NPS.	
COMMENT: Page 278, third full paragraph, last sentence "...would protect YNP's designation as a Class I clean air area...." YNP has been designated a Class I air quality area by statute, so its designation would not be removed.	
RESPONSE: The sentence related to Class I designation will be revised or removed.	
Methods (Air Quality)	
COMMENT: "Park Service employees suspected and reported that Park Service radios interfered with the CO analyzer."	
RESPONSE: Not a comment.	
SUMMARY COMMENT: On page 94, paragraph 3, the last sentence states, "Montana 1-hour standard for CO exceeded." This statement again confuses ambient air quality standards and methods with personal exposure readings. The MAAQS are tied to the same sample collection methods as national standards. There is no evidence in any of the National Park Service reports that these methods were followed. Further, the highest readings reported in Table 9 were taken inside a kiosk, which is not ambient air. The readings should be compared to OSHA standards (50 PPM) or those taken in a toll booth area. These high readings showed that the ventilation system was not installed correctly. This paragraph and Tables 8 and 9 indicate that "air quality standards were occasionally exceeded." This statement is incorrect. The sampling and methods used in the study were not intended to determine compliance with state or national ambient air quality standards, so the data should not be compared to these (NAAQS) standards. Comparison of data to national and state ambient air quality standards requires certain analysis procedures. The procedures used by National Park Service staff were similar to an occupational health investigation. The readings should be compared to OSHA standards (50 PPM) or those taken in a toll booth area. "Page 4, first full paragraph, Potential effects on air quality: This paragraph should be titled "potential effects on public health and the environment." The paragraph confuses air quality (ozone) with occupational and personal exposure levels of CO. It would be best split into two or more paragraphs. Sentence eight that begins "Carbon monoxide can affect humans...." should be removed to start a new paragraph below this one with a description of occupational exposure levels and health impacts. It might be of importance to compare some of Kado's (1999) work to benzene (PEL = 1 PPM, REL = 0.1 PPM and TLV=0.5 PPM) and toluene (PEL = 200 PPM with a 300 PPM ceiling limit, REL = 100 PPM and TLV=50 PPM) standards. The paragraph on personal exposure should also include the last three sentences in this paragraph." See Montana DEQ Comments.	
SUMMARY RESPONSE: Clarification between ambient air quality standards and OSHA exposure standards will be made where appropriate.	
SUMMARY COMMENT: If Wyoming DEQ has not been involved, they certainly need to be, because they do have primacy.	

AIR QUALITY

Response:

When the DEIS was under review, comments were received that the DEIS was inadequate in planning and implementation of air studies in YNP. The Wyoming DEQ was not actively involved during the DEIS analysis and no input was received from them until the completion of the DEIS.

Wyoming DEQ is the regulatory authority for motor vehicles of the Class I area, designated by the US EPA. The NPS has certain authority over transportation items that impact the public lands in their jurisdiction. This includes such items as vehicle related items. NPS has the ultimate responsibility under the law to protect air quality and related values in Class I areas. It has the authority to establish management actions related to road use and, as a result, separate from NAAQS standards and state regulatory processes.

COMMENT:

I have studied no data that is used for air pollution measurement developed specifically for snowmobiles. In each instance, these data sets used, are for two-cycle engines other than snowmobile engines.

Response:

Emission data for two-stroke snowmobile engines have been reviewed.

COMMENT:

Page 164, end of first paragraph: NPS does not consider the impacts of climate or emissions and emission dispersion. The DEIS should have this described. NPS has sufficient data to review (through a model) the effects of ethanol blend fuel for all vehicle and low emission lube oil on a worst-case scenario. Using data supplied in this DEIS for alternative A, studies referenced in this DEIS, and DEQ's professional review, DEQ predicts that the use of ethanol blend fuels and low emission lubrication oils in snowmachines could reduce CO emissions of these vehicles by as much as 26 percent.

Response:

Air dispersion modeling results will be included in the DEIS.

COMMENT:

"Page 8, first paragraph, "...correlation between emissions and snowmobiles ... Air Resource Specialists 1996)...." This statement is incorrect. The report referenced is a draft report that did not incorporate comments (from Montana Department of Environmental Quality) stating that 85 percent of the data are not valid because of leaks and other equipment problems. A better reference would be Kado et al. 1999 that did correlate particulate matter with the number of snowmobiles on an hourly basis."

Response:

The 1999 Kado et al. report will be reviewed for its applicability to understanding air quality effects.

COMMENT:

"Page 9, second paragraph, last sentence "...as a result of snowmobile use...." Even though this is a quote from a draft report, it is not accurate. A preliminary air quality model of the area shows that the snowcoaches also contribute significantly to CO and HC because they have no emission controls."

Response:

Emissions from snowcoaches will be reviewed and included in dispersion modeling for the DEIS.

AIR QUALITY

COMMENT:

Page 177, paragraph 6: DEQ concurs that there would be adverse air quality impacts from the worse case scenario of alternative A, No Action. DEQ's review of data collected and modeling of 1-hour peak emissions indicates that the CO 8-hour average standard is more likely to be exceeded before a 1 - hour standard because the evening temperature inversion forms before the majority of snowmobiles leave the Park. This traps emissions from these machines and causes a peak concentration that is potentially higher than the morning peak (Cain et al. 1999). This was also evidenced in the emissions monitoring summary of February 13-14, 1999 (Ugrowski 1999). However, a violation of the 1-hour standard also is likely given the description of a peak, worst-case day in this DEIS.

COMMENT:

Page 181, last paragraph: "Emissions of CO and particulate ... reduce visibility." This statement is confusing and possibly an incorrect combination of two statements. Particulate, SOX and NOX emissions contribute to reduced visibility because they are suspended in the air. CO is a colorless, odorless gas.

COMMENT:

Page 230, paragraph 3, sentence 5: The effects of "emissions only slightly reduce ..." does not coincide with the effects of emissions restrictions provided in alternative D. DEQ found that the emission requirements listed in alternative D would lower CO emissions from vehicles by 40 to 44 percent of those in alternative A. DEQ estimates that these emissions would reduce the 1 -hour peak CO level for the West Entrance to about 49 percent of the CO level in alternative A. We would anticipate that NPS would have some method to monitor vehicle emissions entering the park to have high polluting vehicles turned back to be repaired.

COMMENT:

Page 249, paragraph four, last sentence: This sentence needs to be changed. This sentence does not reflect that alternative D requires machines with lower emission levels. Under alternative D (Table S-1, S-2), a snowmobile without these emission levels would be turned away from the park. This is at least a moderate impact as described in the DEIS page 161, Table 36, not a minor impact. Please see the comment on page 230, and also paragraph five, on page 258, Clean Air for a correct assessment of the impacts.

COMMENT:

Page 261, first paragraph, and Page 263, paragraph 5, Air quality: Professional judgment of DEQ staff is that air quality at the West Entrance under alternative E would likely exceed a state or national standard for CO without some modifications.

AIR QUALITY

SUMMARY COMMENT:

The Montana DEQ has evaluated a modified alternative E that would require the use of ethanol blend for all vehicles and low emission lubrication oil for all 2-stroke engines entering the Park. This would reduce CO emissions by about 26 percent compared to CO emissions in alternative A (Table 2, Cain et al. 1999). In addition, the use of mass transit snowcoaches in alternative G using the newer emission control systems like the van-conversion snowcoaches would greatly reduce CO from vehicle emissions to about 2 to 4 percent of CO emissions under alternative A. Based on DEQ's modeling analyses, 1-hour peak CO levels for a worse case scenario at the West Entrance would be about 1 to 18 percent of those levels under alternative A. Alternative G would reduce CO levels below any other alternative except alternative F, Closing the roads.

RESPONSE:

The DEQ is aware of the results of the 1999 Montana preliminary air dispersion analysis.

COMMENT:

Ethanol blend gasoline and synthetic oils can reduce snowmobile emissions by up to 35%...

RESPONSE:

Yes, ethanol blend gasoline and synthetic oils can reduce snowmobile emissions by up to 35%.

Negative Effect (Snowmobiles on Air Quality)**COMMENT:**

Not only are snowmobile emissions the principal source of air pollution in the parks, but these emissions are harmful to humans, wildlife, aquatic species, vegetation, and ultimately to park ecology. Snowmobiles are very loud and two cycles engines are too polluting.

RESPONSE:

Impacts of winter recreation and related actions are discussed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.

Negative Effect (Plowing on Air Quality)**COMMENT:**

By plowing the roads, your agency will only have the added burden of automobile traffic and congestion, while continuing to allow noise and air pollution from snowmobiles on other road segments.

RESPONSE:

Impacts of winter recreation and related actions are discussed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.

Negative Effect (Grooming on Air Quality)**COMMENT:**

The majority of alternatives continue to permit snowmobiling and trail grooming despite the substantial adverse impact of these activities on park wildlife, ecology, and air quality.

RESPONSE:

Impacts of winter recreation and related actions are discussed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.

AIR QUALITY
<i>Negative Effect (Snowcoaches on Air Quality)</i>
<p>COMMENT: Also, snowcoaches and trail grooming have many bad results for all wildlife and air quality.</p>
<p>RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.</p>
<i>Negative Effect (Mass Transit on Air Quality)</i>
<p>COMMENT: As to the air and noise pollution created by snowmobiles, a steady stream of diesel busses on the road and idling in the parking lots will also create a lot of air pollution.</p>
<p>RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.</p>
<i>Negative Effect (Visitors on Air Quality)</i>
<p>COMMENT: Noise levels, air pollution levels, and litter, all seem to be major problems developing because of overcrowding.</p>
<p>RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.</p>
<i>Positive Effect (Plowing on Air Quality)</i>
<p>COMMENT: I think that it would be great to plow the road from West Yellowstone to Old Faithful. It would cut down on noise, emissions and other user conflicts.</p>
<p>RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.</p>
<i>Positive Effect (Snowcoaches on Air Quality)</i>
<p>COMMENT: Snowcoaches would reduce the number of vehicles by 90% while allowing as many visitors into the parks. Reducing air and noise pollution would protect the health of wildlife and people while improving the visitors' experience.</p>
<p>RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.</p>

AIR QUALITY	
Positive Effect (Mass Transit on Air Quality)	
COMMENT:	Public vehicles would create much less air and noise pollution than either existing snowmobiles or snowcoaches.
RESPONSE:	Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.
Positive Effect (Limiting Snowmobiles on Air Quality)	
COMMENT:	It is important to maintain the air quality and to control noise pollution by reducing the use of snowmobiles in Yellowstone Park.
RESPONSE:	Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.
Positive Effect (Banning Snowmobiles on Air Quality)	
COMMENT:	Restore natural sounds and clean air by phasing out snowmobiles in Yellowstone and Grand Teton.
RESPONSE:	Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.
No Effect (Snowmobiles on Air Quality)	
COMMENT:	As for air pollution, the impacts [of snowmobile exhaust] seem to be transitory and are eliminated all together with the first stiff breeze that comes up.
RESPONSE:	Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.
No Effect (Banning Snowmobiles on Air Quality)	
COMMENT:	The issue then is allowing equal numbers of people to get into these parks but to greatly reduce the number of vehicles, and along with it to reduce the air pollution and the noise that are compromising these parks.
RESPONSE:	Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.

BISON AND OTHER UNGULATES

SUMMARY COMMENT:

Many people were concerned about the effects of groomed roads on bison. Specifically, some commenters believed that groomed roads cause population increase, distributional changes, and, ultimately, habitat impacts. A common belief was that the groomed roads facilitated travel out of the park, thus contributing to bison control actions and mortality. How groomed roads affect within park migrations and energy budgets were also of concern. Other commenters disagreed, stating that the groomed roads did not affect bison.

SUMMARY RESPONSE:

In the FEIS, NPS cites recent research and monitoring efforts in which bison use of groomed roads was shown to be relatively minor (Biernie 2003, Kurtz et al. 2006). Instead, bison were described as traveling on their own, well-established network of trails, usually in riparian corridors or geographically influenced areas of access forage. The vast majority of bison that exit the park on the west side are not leaving via the groomed road. Closing portions of the road system would not be expected to result in bison shifting to other areas of the groomed road system because bison do not depend on the groomed roads to reach winter range, and use of ranges by particular segments of the bison herd is traditional and consequently would not change simply because certain groomed roads were no longer available. Whether or not groomed roads caused population growth, expansion, and range depletion is the subject of ongoing controversy and research. The FEIS contains a discussion of the pertinent issues. Research is currently being conducted to better understand the relationship between road grooming and bison movement and distribution patterns.

SUMMARY COMMENT:

The DEIS notes that park managers began a program to restore bison populations. However, it fails to note that the effort included the introduction of bison from captive herds to Yellowstone Park in 1902. The DEIS specifies the numbers of bison removals that have occurred during the various interim plans. However, the DEIS fails to note that, except for the period between 1967 and 1984, periodic removals of bison have been an integral component of bison management since 1902. As noted on page 145 of the Interagency Bison Management Plan DEIS, the average number of bison removed per year was actually greater prior to 1967, a period when the overall herd size was considerably smaller, than during the period since establishment of the policy of natural regulation. Moreover, large removals since 1967 have occurred as a consequence of significant increases in bison numbers and corresponding movements of bison from Yellowstone Park in Montana.

SUMMARY RESPONSE:

There is a long history of bison management in Yellowstone National Park and other parts of the world. Such long management removals of varying magnitude. NPS revised the bison discussion in the FEIS, however, under emphasis on bison management removals, the scope and purpose of need for the Winter Use Plan.

COMMENT:

The DEIS suggests that, by the early 1980's, the population fluctuated around 2,000 animals in winter. The term "fluctuated" is not consistent with the population trend that is suggested by the actual counts of bison that are disclosed in Table 13 of the Bison EIS. The number of bison actually counted increased from 397 in 1966-67 to 556 in 1968-69 to 873 in 1973-74 to 1727 in 1978-79 to 2,229 in 1983-84 to 3,159 in 1988-89, the first year in which substantial numbers of bison were removed outside the park.

SUMMARY RESPONSE:

NPS revised the bison discussion in the FEIS; the term "fluctuated" is no longer used.

SUMMARY COMMENT:

The two management plans approach the analysis of impacts to bison very differently; more information on the history of the bison herd should be included in the FEIS.

BISON AND OTHER UNGULATES

SUMMARY RESPONSE:

The winter use planning team and the bison planning team coordinated to make the two plans as consistent as possible. The objectives of the two planning efforts are quite different, and therefore so are the methodologies used to analyze impacts. undue emphasis on bison management, including the estimation of carrying capacity for bison in YNP, is outside the scope and purpose and need for the Winter Use Plan. Nonetheless, an extended discussion of the bison herd is included in the FEIS.

COMMENT:

The DEIS includes GTNP but the bison section did not include a description of the bison herd in that park.

RESPONSE:

Comment noted; the FEIS contains a discussion of the GTNP bison herd.

COMMENT:

The section of bison should include a discussion of the bison that migrate from the YNP interior, over Sylvan Pass and down the Shoshone River.

RESPONSE:

Comment noted; the FEIS contains this information.

COMMENT:

The writer uses the words "perceived risk of transmission of brucellosis". The Bison DEIS (pages 16 to 22) discusses not only the real threat of transmission, but also the perceptions within livestock markets of cattle from an area which has a brucellosis exposed herd. Currently APHIS only allows certain bison to roam into a small part of Montana without the possibility of sanctions being imposed on the movement of domestic livestock. In addition, the National Academy of Sciences (NAS), National Research Council report explicitly defines the risk as "small but real". These issues need to be disclosed to the public.

RESPONSE:

The discussion was revised in the FEIS; "perceived risk" was not used.

SUMMARY COMMENT:

The NPS should conduct research on the effects of winter recreation on bison.

SUMMARY RESPONSE:

The FEIS contains information about a few recent years of which is ongoing bison monitoring and research project that collected data on bison locations and movements in relation to winter.

COMMENT:

This section implies that there is a bison hunt. Montana law does NOT authorize a hunt.

RESPONSE:

No bison hunt is mentioned in the FEIS.

BISON AND OTHER UNGULATES

COMMENT:

This DEIS section does not adequately disclose to the reader key elements about bison that are very relevant. In describing the environment the DEIS should reference the recent NAS review of Brucellosis in the Greater Yellowstone Area. Specifically the NAS report (Page 58) states "None of the weather variables or indexes shows a significant correlation with bison moving out of YNP, indeed, none is even suggestive. Only estimated bison population size is significantly related to the number of bison migrating out of the park". Also, the NAS (Page 61) says bison population size appears to be the overwhelmingly significant variable controlling movement out of YNP and that bison, however, have shown no evidence of regulation, but only of range expansion (Page 122). The likely consequence of shifting the boundary of protection from YNP to surrounding public lands is that bison, and perhaps elk, populations will simply increase further, shifting the boundary of protection from YNP to a new point-private lands-where even greater numbers of bison will have to be dealt with.

RESPONSE:

The DEIS incorporates the NAS report.

COMMENT:

Although it has been documented, I would have to see proof, that bison were in the Park earlier than the 60's.

RESPONSE:

NPS does not know what the commenter would consider to be sufficient proof regarding the history of bison in YNP. NPS finds documentation adequate and does not disagree that bison are native to the Yellowstone area.

SUMMARY COMMENT:

The Winter Use DEIS and the Bison DEIS did not adequately analyze the effects on bison population dynamics from closing particular road segments to winter travel.

RESPONSE:

The Winter Use DEIS went in coordination with the Bison DEIS in regards to the bison analysis, including movement data. NPS believes it has done an adequate job in disclosing what is known about bison use and bison movement.

SUMMARY COMMENT:

The DEIS does not clearly state why bison are removed from the population when they leave they park. Bison are removed according the federal-state Interim Operating management plan due to the presence of brucellosis.

RESPONSE:

The DEIS does not state why bison are removed.

COMMENT:

I am in favor of the destroying of bison, when need be, they are a renewable resource. I do not feel that the whole herd needs to be decimated but I do feel the periodic harvesting of the animals is healthy for the range condition and the long-term well being of the herd.

RESPONSE:

See the Bison DEIS for an in-depth analysis of management strategies.

SUMMARY COMMENT:

If the NPS is going to consider the economic impacts of its proposed alternatives, then this must include an analysis of the economic costs of continuing to permit snowmobiles in the Parks including the cost of pollution, the killing of bison outside the Park and the cost to the Park's ecology from continued degradation.

BISON AND OTHER UNGULATES

SUMMARY RESPONSE:

NPS considered the effects of winter use on bison, pollution, and other aspects of the natural environment in the FEIS.

SUMMARY COMMENT:

Many people were concerned about bison and other ungulates use of plowed roads, and how plowing the road under alternative B would affect any such use. Specifically, commenters believed that plowing the roads would create large snow berms and that plowed roads would be easier for ungulates to walk on than groomed ones, and, as a result, more ungulates, particularly bison, would travel out of the park and be subjected to management control actions on adjacent lands.

SUMMARY RESPONSE:

In response, NPS asserts that there is no evidence to suggest that bison use of plowed roads would differ from their use of groomed roads, and that overall, use of groomed or plowed roads is minimal (Bjornlie 2000, Kutz et al. 2000). Instead, bison were described as traveling on their own, well-established network of trails, usually in riparian corridors or geothermally influenced areas. Elk use of plowed vs. groomed roads would also not be expected to change. The FEIS includes additional information on bison and other ungulate movements and use of plowed roads. Furthermore, NPS does not believe that plowing the road under alternative B would create snow berms large enough to seriously impede movements out of the road corridor. Other road segments within the park are plowed without any such result. However, mitigation measures to alleviate any effect of high snow berms are included in the FEIS.

COMMENT:

Alternative E does provide for flexibility in wildlife issues by an advisory committee [...] but I feel as if inclusion of this committee allowed the reviewers the "excuse" to leave necessary detail out of this alternative, specifically bison and other wildlife winter range use.

RESPONSE:

The committee feature of alternative E had nothing to do with the amount of detail provided on wildlife, including bison, in the DEIS. The discussion was expanded in the FEIS.

SUMMARY COMMENT:

It [B] does not address the bison migration issue and the relative impact of grooming vs. plowing on bison.

SUMMARY RESPONSE: The effects of groomed and plowed roads on bison migration are discussed under alternative A in the FEIS; subsequent alternatives are compared and contrasted to alternative A. The discussion was expanded in the FEIS.

SUMMARY COMMENT:

Several commenters felt that NPS did not put enough emphasis on the correlation between bison leaving the park and winter road management.

SUMMARY RESPONSE:

How groomed or plowed roads affect bison movements is under study. Recent research indicates that the majority of bison do not leave the park on groomed roads. The FEIS contains a revised discussion of the bison issue and NPS believes it has done an adequate job in disclosing what is known about the relationship between winter use and bison.

SUMMARY COMMENT:

Commenters felt that NPS should evaluate the carrying capacity for bison in the Winter Use Plan DEIS.

SUMMARY RESPONSE:

NPS maintains that it is outside of the scope of the Winter Use Plan to configure carrying capacity for bison and other wildlife species.

BISON AND OTHER UNGULATES**COMMENT:**

Perhaps the single most important conclusion that might be drawn from the history of this bison herd, as presented in the DEIS for Interagency Bison Management Plan, is that, in spite of significant decreases during the latter half of the Nineteenth Century and periodic management removals throughout the Twentieth Century, the natural tendency of this bison herd is to increase. Cheville et al. (1998) apparently reached a similar conclusion. "The lack of stabilization of bison population growth over time since the natural-regulation policy was adopted suggests that bison have expanded like a wave from across suitable habitat in YNP with little diminution until now they are pressing against the borders of YNP in winter. The prospect, therefore, is for the bison population to increase over some years until the coincidence of a high population and a hard winter results in the population being reduced once again (as happened in 1996-1997). Given the lack of a dynamic equilibrium, the bison numbers are expected to start building again." This logic should at least be considered in the analysis of alternative A.

RESPONSE:

Additional information on the bison population was included in the FEIS.

COMMENT:

The discussion about ungulates espouses a particular theorem by Mary Meagher but does not disclose the data analysis in the NAS report indicating that population size not winter weather was the factor most critical to range expansion. Both papers by Meagher 1993 and Meagher et al 1994 are discussion papers and do not provide quantitative evidence to support conclusions.

RESPONSE:

The FEIS includes information from the NAS report.

COMMENT:

This removal of bison carcasses has led to a decreased availability of spring food sources for grizzly bears. There is no mention in the DEIS of the cumulative effects of the removal of these carcasses, and the loss or decrease of other critical food sources (cutthroat trout and white bark pine nuts) necessary to the survival of the grizzly bear.

RESPONSE:

These issues are addressed under the discussion of grizzly bears under alternative A in the FEIS.

COMMENT:

If you eliminate the snowmobile trails and plow the road, they will continue to leave. If you eliminate the snowmobiles and allow only cross-country skiers in, they will create a trail which the bison will use. If you allow no visitors into the park, the buffalo will make their own trails, and some will continue to leave the park. Accordingly, I do not believe that this issue should be addressed unless the bison numbers are below a desired level in the park.

RESPONSE:

The effects of winter recreation on bison are the subject of ongoing study, and will remain so regardless of the bison population level. An assessment of how the various activities mentioned affect bison is discussed under alternative A in the FEIS.

SUMMARY COMMENT:

NPS should close roads to snowmobiles to evaluate how closures would affect bison.

RESPONSE:

Road closures would require separate site-specific NEPA analysis and public comment. NPS is currently studying the effects of roads on bison management. Results are discussed in the FEIS.

BISON AND OTHER UNGULATES

COMMENT:

Are the buffalo going to cause safety hazards to motorists?

RESPONSE:

NPS assumes that the commenter believes that more bison will be on the road if it is plowed (alternative B). Because there is no evidence to suggest that heavy use of the plowed road would change relative to current levels safety concerns regarding motorist use and bison would not increase. Rather, collisions may decrease because the more transit feature would reduce traffic levels over the use of private snowmobiles.

COMMENT:

We find it puzzling that more focus was not placed on the role of that hellish snowmobile whine as a possible contributing factor in driving bison out of the Park and to their deaths in Montana.

RESPONSE:

NPS believes that analyzing the effects of machine noise on ambient sound levels can be used to infer effects on wildlife. NPS also believes that the effects of noise on wildlife are implicit in the assessment of the effects of motorized recreation on wildlife. Nonetheless, a review of the impacts of noise on wildlife is included in the FEIS.

COMMENT:

Also, no guidelines are established to determine when the Bison Plan and Winter Use plan conflict with regard to bison management, which would take precedence.

RESPONSE:

Because the plans will be consistent in their approach to winter use management and bison, neither plan would need to "take precedence" over the other.

SUMMARY COMMENT:

If the numbers of snowmobiles on the east side are increased aren't impacts to bison on this side of the park increased as well (e.g., in the Mud Volcanoes and Pelican Creek/Mary Bay areas)?

SUMMARY RESPONSE:

If more people snowmobiled on the east side of the park under alternative F, resultant impacts to bison could potentially increase on that side of the park. A statement to this effect was included in the FEIS. However, it is unknown whether or not increased use would occur as a result of closing the west and north entrances. See "effects on Visitor Access and Circulation" under alternative F.

SUMMARY COMMENT:

The DEIS failed to adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability on its beleaguered bison population, on predator/prey dynamics of coyotes and wolves, on critical but fragile thermally influenced habitat and vegetation, nor did it properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

SUMMARY RESPONSE:

The discussion of impacts was expanded in the FEIS.

BISON AND OTHER UNGULATES

COMMENT:

The authors make careful note that bison do not move out of the Park via the road from Seven mile bridge to West. Recent tracking data and observations by many biologists indicate that the road from Madison Junction to Seven mile bridge is the main travel route for bison moving in to the Cougar Meadows and Lower Madison below Seven-mile Bridge. This route is down through a narrow canyon and funnels bison toward the areas which lead ultimately to West Yellowstone. This should be disclosed in the document so the readers know that some critical groomed road segments are essential to movement out of the Park. Additionally there is a critical section of groomed road along the Firehole to Madison Junction which is used most of the time for bison moving to the Madison. These road segments are almost always used by the bison that move to and from these wintering areas.

RESPONSE:

This information was included in the FEIS.

COMMENT:

We are changing the trails partially to protect buffalo. Buffalo don't belong in the Park. They aren't native to the Park.

RESPONSE:

On the contrary, bison are native to the Yellowstone area. However, the purpose of expanding options to winter use is not to "protect" bison but to best manage increasing winter use while preserving all of the park's resources.

COMMENT:

Although bison are discussed as an "important element of the ethnographic landscapes significant to American Indian" (page 132 of the DEIS), this process largely ignores the importance of bison in favor of human activities that are obviously detrimental to this resource.

RESPONSE:

NPS does not agree that it ignores the issue of bison, nor does it agree that the activities discussed in the Winter Use Plan are on their face "obviously detrimental" to bison. Ultimately, it will be up to the decision maker to weigh the evidence and to determine what uses are compatible with the overall mission of the plan to preserve all of the park's resources, including bison.

COMMENT:

The section also indicates bison on the northern end of YNP travel on unmaintained trails, game trails, and over open terrain to and through public lands throughout the park. Included in this list should be the several documented movements we have established in our radio work when bison traveled the highway from Tower over Blacktail and down to Mammoth. This travel route is clearly identified in data from 2 bison wearing GPS collars and we have observed or followed bison on this road several times. Cite (Aune et al. Unpublished data, Aune et al 1997). The DEIS does not have the Aune et al, 1997 citation in the literature cited.

RESPONSE:

The FEIS includes this information and cites Kurz (2000).

SUMMARY COMMENT:

Snowmobiles in the National Parks seriously endanger bison and other wildlife, and will lead to their endangerment and demise. NPS should have included a no-grooming, no-snowmobiling alternative.

BISON AND OTHER UNGULATES

SUMMARY RESPONSE:

Data does not support the fact that snowmobilers are "actively eroding" bison (or other wildlife). Ultimately, it will be up to the decision maker to weigh the evidence and to determine what uses are compatible with the overall mission of the plan to preserve all of the park's resources, including bison. Effects on individual animals from snowmobiling do occur, but whether the effects are severe enough to affect over-winter survival is unknown and currently not supported by data.

SUMMARY COMMENT:

Snowmobiling does not seem to affect bison or elk.

SUMMARY RESPONSE:

The effects of snowmobiling on bison and elk are discussed in the FEIS (see alternative A).

COMMENT:

Bison are an important source of food for bears, wolves, and other animals.

RESPONSE:

This fact is disclosed in the FEIS.

COMMENT: The analysis of the effects on ungulates of the presence and use of groomed surfaces for alternative F should disclose the effects, if any, on the movements and distribution of bison.

RESPONSE:

A brief discussion is included in the FEIS under alternative F. Because bison use of groomed surfaces has been demonstrated to be minimal (Kurz et al. 2000; Monroe et al. 2000) NPS would not expect bison to significantly alter their traditional migrations simply because roads on the west side were no longer groomed.

SUMMARY COMMENT:

Many commenters provided additional citations or information to support their position on the effects of winter use on ungulates.

SUMMARY RESPONSE:

The FEIS contains an expanded literature review, but did not attempt to include every suggested reference. The CEQ regulations (40 CFR Parts 1500-1508) do not require exhaustive and voluminous discussion, especially when the discussion can be characterized as background and adding needless detail (§1500.4 (f)). The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (§1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at §1502.21 (incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure.

COMMENT:

Consider using current regulations as a way to protect wintering ungulates.

RESPONSE:

Alternative A describes current winter use management.

SUMMARY COMMENT:

General expressions of concern about wintering ungulates.

BISON AND OTHER UNGULATES

SUMMARY RESPONSE:

Comments noted. NPS is committed to using the best available information to manage for viable herds of ungulates and secure winter range.

COMMENT:

I have noticed that cross-country skiers with packs on their backs panic ungulates more than snowmobiles.

RESPONSE:

The effects of nonmotorized uses on ungulates are discussed in every alternative see alternative A for a complete review.

COMMENT:

p. 182 - ungulates - it would be better to describe highway 191 as linking Bozeman and West Yellowstone than Bozeman and Big Sky.

RESPONSE:

The FEIS was changed accordingly.

COMMENT:

p. 184 - need some references, citations or personal communications for some of this information --same on p. 185—you need cites on displacement, energy expenditure, etc.

RESPONSE:

The discussion was expanded in the FEIS and additional citations used.

COMMENT:

The meaning of this sentence is unclear. If the impacts are applied to the entire population of an area, are the impacts more or less severe? Clarify. This comment applies elsewhere where the statement "... unless they are applied to the entire population of an area" occurs.

RESPONSE:

To avoid confusion, the statement was removed in the FEIS. The intent was to differentiate between impacts to individuals vs. populations. Population impacts are of greatest concern.

COMMENT:

In the section, "nonmotorized uses on groomed and ungroomed routes", the authors dismiss the effect of this use because peoples travel routes are shorter and ungulates do not need to move far to avoid the use. Yet the evidence in several scientific studies shows that the escape distance and behavior reactions of wildlife from skier and snowshoe approaches are in fact greater. The impact of an activity is related to the physiological effect and energetic costs of reacting to the impact not by the distance traveled by winter recreationists. The rationale used here is not valid. Smaller numbers of encounters with people on foot can have greater impact than a larger number of encounters with minimal behavioral reaction.

RESPONSE:

This section was revised in the FEIS.

COMMENT:

I think we need to evaluate the relative amount of disturbance a few skiers have on elk, now that wolves are back, who may have an influence on moving elk around far more than skiers may. Aspects of this that need study are: 1) the relationship of predictability of travelers on foot to their displacement of wintering animals, 2) whether or not elk on the northern range equate skiers with hunters due to experience north of the park, and 3) can grooming of trails in areas of low conflict encourage skiers to select them instead of venturing into areas of higher conflict with wildlife? In other words, provide a carrot as well as a stick.

BISON AND OTHER UNGULATES	
RESPONSE:	The PEIS contains a section on research needs.
SUMMARY COMMENT:	Several people commented on the energetics of walking on groomed roads, and expressed their belief that any energy saved would be offset by the increase in disturbance or harassment associated with using these routes. They objected to the discussion of energetics in the DEIS.
SUMMARY RESPONSE:	The discussion on energetics was revised in the PEIS; it is largely unknown whether or not energy saved by using groomed routes is greater or less than that expected.
COMMENT:	Winter recreation, both motorized and nonmotorized, in Grand Teton and adjacent Forest lands has been a major concern of the Department in the Jackson Region since the mid-1980's. In unrestricted National Forest lands and in some areas of Grand Teton National Park, we have observed a shift in animal distribution due to increases in winter recreation activities. The preferred alternative calls for adaptive management and mitigation of impacts based on monitoring results. While this is a good implementation idea, we have previously made comments on where mitigation is already known to be needed.
RESPONSE:	NPS is aware of the Department's concerns and has addressed them into the PEIS (e.g., problems associated with Wolff Ridge and Blacktail Butte).
COMMENT:	This tunnel effect is observable in each post snowmobile period. During this period the use of the roads by bison increases and the impact is that bison more readily move longer distances and could exit the Park more easily than on groomed snowmobile trails.
RESPONSE:	Increased use of the plowed road is associated with bison traveling to areas of spring green-up, which happens to coincide with the plowing of the road. Bison use of plowed vs. groomed roads is not expected to differ, and such use has been documented as relatively minor (Bionelle 2000, Kurz et al. 2000).
COMMENT:	Much would revert very quickly without the pressure, but the potential is increasing steadily for problems with some of the wallow sites on ridges (blowouts, gully heads) and some of the routes. The potential for exotic plant establishment in this highly-disturbed habitat cannot be over-stressed. The wooly hair of bison is ideal for transport species such as yellow sweet clover, now rampant on the northern range, along roadsides and adjacent slopes.
RESPONSE:	The effects of groomed roads on the spread of exotic weeds by bison is theoretical and outside the scope of analysis.
SUMMARY COMMENT:	General expressions of support for or opposition to: grooming; snowmobiles; snowcoaches; plowing; and mass transit.
SUMMARY RESPONSE:	Comments noted. Expressions of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. People who commented in this fashion are asked to consider that there is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.
COMMENT:	Mass transit would cause elk jams.

BISON AND OTHER UNGULATES	
RESPONSE:	On the contrary, the use of NPS-managed buses or snowcoaches would allow for greater control over where and when vehicles stop.
SUMMARY COMMENT:	Several people expressed their concern over the impacts to bighorn sheep. One commenter felt there needed to be more data on whether recreation impacts to the sheep were actually occurring.
SUMMARY RESPONSE:	Because the sheep population is struggling in GTNP, a conservative approach is necessary to preserve these animals – therefore any impacts from recreation are unacceptable. The discussion on bighorn sheep was revised in the FEIS and the preferred alternative calls for additional closures in several important bighorn sheep areas, including all areas above 9,900 feet on Prospector Peak.
COMMENT:	The Greater Yellowstone Interagency Brucellosis Committee has compiled population information for each of the elk herd units in the GYA. That information and the corresponding population objectives for each herd should be included in the DEIS.
RESPONSE:	A discussion of the population objectives for each GYA elk herd unit is outside the scope of the FEIS.
COMMENT:	Due to the artificial introductions of mountain goats into previously unoccupied range, they cannot be considered a product of natural colonization. Although it may be necessary from a practical standpoint to accept their occupation in YNP, this should be evaluated in terms of their impact on the native bighorn sheep populations and distribution. Due to the precarious status of bighorn sheep in GTNP, expansion of mountain goats from the Snake River Range into the Teton Range is unacceptable.
RESPONSE:	The discussion of mountain goats was revised in the FEIS and moved to "impact topics dismissed". GTNP collects and records observations of mountain goats in the park. Presently, goats are not commonly observed; if their presence should increase the park will investigate potential impacts to sheep and explore options for management.
COMMENT:	Test all the bison in the parks for brucellosis.
RESPONSE:	NPS refers the commenter to the Bison EIS for discussions and analyses related to brucellosis management.
COMMENT:	If you are so concerned about the bison starving and leaving the parks in the winter-- feed them.
RESPONSE:	NPS refers the commenter to the Bison EIS for discussions and analyses related to bison management.

CULTURAL RESOURCES

COMMENT:

"Indians consider...disrespectful of the animals." This is hard to believe, since Indians historically have eaten bison.

RESPONSE:

During past centuries, many American Indians on the Great Plains looked to bison for their life and livelihood. Bison provided the very basic elements of survival: food, shelter, and clothing. Because Indians profoundly identified with the animals and plants of their world, however, the death of a bison was not a small thing. Indian belief and custom dictated that bison be killed only for subsistence and that the appropriate rituals be fulfilled beforehand. For Indians the proper ritual treatment of bison was essential. As long as the Indians harvested the bison and only killed bison to fulfill their own subsistence needs, the sanctity of the bison was not violated. The tradition continues today among those tribes that are re-establishing bison herds for practical and spiritual purposes.

COMMENT:

"Average winter visitor is a highly educated, relatively wealthy, middle-aged white male." Perhaps this group should file a lawsuit claiming their traditional uses are being taken away.

RESPONSE:

According to the National Park Service's Cultural Resource Management Guideline (DO-28), traditional users of park resources generally differ as a group from recreational users. Although recreational users may value National Park Service units, such as Yellowstone and Grand Teton National Parks, groups traditionally affiliated with particular parks typically assign significance to places closely linked with their own sense of purpose, existence as a community, and development as ethnically distinctive peoples. These places may support subsistence or ceremonial activities or represent birthplaces of significant individuals or group origin sites. They may be migration routes marking, for example, the Native American migration or northward sanctuary and freedom trails of 19th century African Americans. Traditional user groups are likely to be Alaskan natives, American Indians in the contiguous 48 states, and Pacific island peoples such as Hawaiians. They could also be diverse ethnic groups such as those associated with Cape Cod, African Americans at Jean Lafitte, Asian Americans at Montezuma, and Hispanic Americans at Tumacacori. American Indian people are highlighted because of their governmental relationship to the federal government, a point made by treaties, legislation, a significant body of case law, Department of the Interior trust responsibilities and regulations, and National Park Service management policies.

COMMENT:

The document has several effects upon the natural cultural resources in the park. The park has been, and continues to be, territory that the tribes claim, not only the Shoshone-Bannocks, but also the Crows, the Eastern Shoshones, the Arapahos, and several other tribes that have a major interest in the protection and preservation of our history and our resources there in the park. Any kind of impact to those types of resources is going to be detrimental to our history and to the relationships that were devised within the treaties that the United States government made with the tribes in efforts to open up lands for non-Indians.

CULTURAL RESOURCES**RESPONSE:**

The National Park Service is committed to recognizing the past and present existence of American Indians in the region and the traces of their use as an important part of the cultural environment to be preserved and interpreted. Throughout the planning process the National Park Service invited American Indian tribes traditionally affiliated with the greater Yellowstone area (Blackfeet, Crow, Nez Perce, Northern Arapahoe, Northern Cheyenne, Confederated Salish and Kootenai, Shoshone-Bannock, Shoshone-Eastern Band, Assiniboine & Sioux, Cheyenne River Sioux, Crow Creek Sioux, Flandreau Santee Sioux, Gros Ventre & Assiniboine, Kiowa Tribe of Oklahoma, Lower Brule Sioux, Oglala Sioux, Rosebud Sioux, Sisseton-Wahpeton Sioux, Spirit Lake Sioux, Standing Rock Sioux, and the Yankton Sioux) to consult, as well as to participate in a general tribal consultation meeting at Yellowstone National Park on May 20, 1999, during which the Winter Use Plan/Environmental Impact Statement was discussed. The National Park Service will continue to consult with representatives of affiliated tribes as actions resulting from this plan are implemented, to insure that their interests and concerns are adequately addressed, as well as to develop and accomplish its future programs in a way that respects the beliefs, traditions, and other cultural values of the American Indian tribes who have ancestral ties to the area.

COMMENT:

The Winter Use Plan Draft EIS does not adequately take into account the cultural or economic significance of the Lower Loop of the Yellowstone Grand Loop.

RESPONSE:

The Yellowstone Grand Loop was determined eligible to be listed in the National Register of Historic Places and a nomination form is being prepared. To be eligible to be listed in the National Register, a historic property must be significant and possess integrity. Integrity is the ability of a historic property to convey its significance or retain the identity for which it is significant. If a historic property possesses integrity it will always have several, and usually most, of the following seven characteristics: location, design, setting, materials, workmanship, feeling, and association. None of the proposed alternatives would adversely affect the integrity of the Grand Loop.

COMMENT:

The description of Ethnographic Landscapes includes the following sentence: Within the GYA, bison constitute an important element of ethnographic landscapes significant to American Indians. Technically this sentence is correct. However, it should be noted that, since the establishment of Yellowstone National Park, public policy has limited the distribution of bison to the park, not the entire GYA. Most recently, this public policy has been articulated in Park Service's 1986 Boundary Control Program; the 1995 settlement agreement between the Secretaries of Interior and Agriculture and State of Montana; and, the Interim Bison Management Plan, developed pursuant to that settlement agreement.

RESPONSE:

Defining the boundaries of potential ethnographic landscapes presents considerable challenges. For example, changes in land use and the historic range of bison in the Greater Yellowstone Area have taken place through time. These changes, as well as the reasons such changes occurred, would be documented and considered in developing a rationale for formally identifying any ethnographic landscape that bison were a significant contributing element to.

COMMENT: The DEIS failed to disclose how it was determined that bison fit the definition of a cultural/ethnographic resource and the extent to which that determination is consistent with the National Historic Preservation Act.

CULTURAL RESOURCES**RESPONSE:**

According to the National Park Service's Cultural Resource Management Guideline (DO-28), ethnographic resources are assigned cultural significance by traditional users. "The decision to call resources 'ethnographic' depends on whether associated peoples perceive them as traditionally meaningful to their identity as a group and the survival of their lifeways... The traditional management distinction between natural and cultural resources may be inapplicable where ethnographic resources are concerned. When natural resources acquire meaning according to the different cultural constructs of a particular group, they become ethnographic and thus cultural resources as well."

COMMENT:

The discussion of the effects of alternative A on cultural resources should more clearly distinguish between effects on bison as a natural resource and effects on bison as an ethnographic resource.

RESPONSE:

Though the traditional management distinction between natural and cultural resources may be inapplicable where ethnographic resources, such as bison, are concerned (please see previous comment response), the discussion of impacts to cultural resources under alternative A focused solely on bison as an ethnographic resource. The text, however, referenced further discussions of impacts to bison as a natural resource, which are found in the examination of impacts for each alternative under Effects on Natural Resources, Wildlife-Ungulates.

COMMENT:

The long-term cumulative impacts of emissions upon air quality and food and medicinal plants as cultural resources have not been adequately addressed.

RESPONSE:

As stated in the discussion of air quality monitoring on page 109, "[a]ir pollutants (primarily from nitrogen and sulfur) may be deposited on terrestrial and aquatic resources through rain, snow, cloudwater, dryfall and gases and may affect resources such as vegetation and water chemistry." While the visible impacts (haze and odor) of snowmobile emissions upon air quality are usually short term, depending upon the location and such environmental factors as wind, the long-term impacts of air pollutants on the environment and human health are less well known. Studies are underway to ascertain and understand such long-term impacts. The studies will help identify the long-term impacts of air pollutants on the parks' resources, such as vegetation, and provide insight into how the traditional use of such resources by American Indians would also be impacted.

COMMENT:

The long-term cumulative impacts of emissions upon air quality and food and medicinal plants as cultural resources have not been adequately addressed.

RESPONSE:

Both Table 4 (Summary of Effects, Alternative A-No Action, Cultural Resource) and the text on page 193 state that bison would continue to be adversely impacted as an ethnographic resource.

COMMENT:

The requirements for cultural resource management should be articulated and analyzed. The DEIS simply states, "the National Park Service is mandated to preserve and protect its cultural resources through the Organic Act of 1916 (USC title 16) and such specific legislation as:" and then lists 14 statutes and policies that apply. The analysis should articulate the relevance of each and how the alternatives would be affected by these considerations.

RESPONSE:

Rather than describe in detail the content of the many statutes, policies, and guidelines referenced in Appendix C, it is sufficient to briefly convey that the various statutes, policies, and guidelines both individually and collectively support the National Park Service's overarching mandate to preserve, protect, and manage cultural resources under its jurisdiction. Most importantly, with regard to cultural resources and the associated planning for the Winter Use Plan/Draft

CULTURAL RESOURCES

Environmental Impact Statement, are Sections 106 and 110 of the National Historic Preservation Act (NHPA) and the necessity for consultations with American Indians. The importance of complying with Sections 106 and 110 of the NHPA, as well as the need for American Indian consultations, are examined in greater detail in Appendix C.

COMMENT:

We also come to Yellowstone to show families and friends our heritage. Quit destroying all of it or any of it.

RESPONSE:

Please refer back to the second response in this section.

COMMENT:

Additionally, noise impacts have been adequately addressed. Many tribal visitors come to Parks for solitude and pristine environment as part of a traditional cultural practice.

RESPONSE:

An important part of the National Park Service mission is the preservation and/or restoration of natural soundscapes associated with national park units. The natural ambient soundscape comprises the natural sound conditions in a park that exist in the absence of any human-produced noises. Natural sounds are intrinsic elements of the environment, and are inherent components of "the scenery and the natural and historic objects and wild life" protected by the National Park Service's Organic Act. The National Park Service will continue to address, through appropriate planning processes involving agencies, visitors, concessionaires, and park neighbors, the preservation of natural soundscapes and the elimination, mitigation, or minimization of intrusive noise sources in Yellowstone and Grand Teton National Parks, to ensure that every visitor that so desires, including American Indians participating in traditional cultural practices, will have the opportunity to experience the natural sounds of the parks without impairment.

GEOHERMAL HABITATS

COMMENT:

DEIS fails to comprehensively evaluate the impacts of snowmobile use on park habitats (particularly fragile geothermal areas).

RESPONSE:

Snowmobile use is prohibited within geothermal areas in the park.

COMMENT:

The DEIS is severely flawed and inadequate for the following reasons: (1) It fails to seriously consider a no-snowmobiling, no-trail grooming alternative. (3) It fails to comprehensively evaluate the impacts of snowmobile use on park wildlife (including threatened and endangered species), air and water quality, vegetation, serenity and solitude, ecology, park habitats (particularly fragile geothermal areas), and nonmotorized users.

RESPONSE:

1) It is within the discretion of the decision maker to set the range of alternatives to be considered. How can the decision maker assess the impacts of an action without considering an alternative that includes it? If there is doubt about the level or type of use that might be acceptable, relative to impacts and mandated tolerances, then how can a determination be made without an appropriate range of alternatives? NEPA requires a "no action" alternative (40 CFR §1502.14(d)). In this case, since motorized use exists, and was sanctioned in the past under existing rules, policies and plans, "no action" is correctly interpreted as the existing management situation. CEQ directly supports this position. Its opinion is that in instances where ongoing programs are being evaluated, "no action" is "no change" from current management direction or level of management intensity. In these instances, CEQ states: "To construct an alternative that is based on no management at all would be a useless academic exercise (Question 3 of CEQ 40 Most-Asked Questions). 3) NPS disagrees that it has failed in its obligation to disclose the impacts of snowmobiles on the park's resources and nonmotorized users. The CEQ regulations do not require exhaustive and voluminous discussion, especially when the discussion can be characterized as background and adding needless detail (40 CFR §1500.4 (f)). The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (40 CFR §1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at 40 CFR §1502.21 (Incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure.

COMMENT:

The DEIS failed to adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability of its beleaguered bison population, on predator/prey dynamics of coyotes and wolves, on critical but fragile thermally influenced habitat and vegetation, nor did it properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

RESPONSE:

The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (40 CFR §1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at 40 CFR §1502.21 (Incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure.

NATURAL QUIET

NATURAL QUIET – AFFECTED ENVIRONMENT

*General (Natural Quiet)***COMMENT:**

The DEIS' approach to mitigating snowmobile noise is inadequate in the face of stringent NPS policy regarding natural quiet. The DEIS divides park areas into "foreground", "middleground" and "distant areas" and sets appropriate visitor expectation and sound levels for each. The Parks' rationale for such a system is arbitrary and not adequately supported. It is not in line with existing park policy regarding the value of natural quiet.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission. The FEIS retains the discussion of these types of park areas, but focuses its impact analysis on audibility regardless of location, with audibility being the best means of assessing intrusions upon the natural soundscape.

COMMENT:

Other parks, including Grand Canyon and Everglades, can provide technical guidance and data which the parks can use to design studies appropriate for winter impacts. We encourage the NPS to apply these rich data sources, new technology, and analytical insights to the present Yellowstone analysis of natural quiet. Specifically, we recommend that the Parks conduct "Percent of Time Audible" studies focusing on snowmobile noise. This type of data is most relevant, as the mere presence of snowmobile noise is the issue, rather than the loudness or proximity of it.

RESPONSE:

The February/March 2000 study undertaken as part of the revision of the DEIS measured and calculated sound levels in the presence and absence of human-generated intrusions at eight different sites in the parks. Additionally, audibility logging of natural and human-generated sounds was conducted at each site. Please see the discussion in Chapter III under Natural Soundscape for these results, including the revised natural background sound levels used in the FEIS analysis. Distances to the limits of audibility for different types of individual vehicles are presented for open and forested terrain for quiet and average background conditions in Chapter IV under Effects Common to All Alternatives. The results of the subsequent calculations are presented in Chapter IV in the sections on the impacts of implementing each alternative; included are tables of acreage in the parks where vehicles would be audible for different amounts of time.

COMMENT:

The only existing data on noise pollution in the parks demonstrate that snowmobile noise far exceeds NPS' best guesses, as included in the DEIS. Anecdotal reports document severe degradation of natural quiet up to 20 miles into the backcountry. This penetration distance was clearly not anticipated for by the parks (see Wilderness section), as proposed wilderness was set at one or less miles from the road. Current snowmobile use renders large portions of Yellowstone unusable by those seeking natural quiet. Yochim (1998) compiled reports of noise penetration up to 15-20 miles into park wilderness. The average distance excluding the 1520 mile report was about six miles. A recent map (Attachment C, National Parks and Conservation Association, 1999) has shown noise penetration of ten miles into the park. Even with a more conservative estimate of a five-mile noise penetration zone (Attachment D, Bluewater Network, 1999), visitors have to go great lengths to experience natural sounds.

RESPONSE:

The 1994-1996 in CTNP data and the 2000 YNP/GTNP data were used in the FEIS for computer modeling, by one-third octave frequency bands, of the distances to the limits of audibility for different types of individual vehicles for open and forested terrain under quiet and average background conditions. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

NATURAL QUIET	
Facts or Data (Natural Quiet)	
COMMENT: Until accurate emissions and noise measurements are made in the Park, which to my knowledge have not been made, there is no data that shows how much undesirable pollution the winter use is contributing.	
RESPONSE: Please see earlier response in regards to the "February/March 2000 study."	
COMMENT: Some of the methods to collect data on air quality and sound are confusing.	
RESPONSE: Accurate measurement of sound levels and calculations of audibility require complex procedures that can be confusing. The goal, however, is to provide the results of that work in an understandable manner. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.	
COMMENT: I was mainly struck by the lack of clear definitions and explanations provided about the specific impacts of noise, and the lack of detailed outlines of areas affected by noise for the different alternatives.	
RESPONSE: Please see earlier response in regards to the "February/March 2000 study."	
COMMENT: Research supports the fact that noise of the intensity of snowmobiles' decibels causes hearing loss.	
RESPONSE: Prolonged daily exposure over many years to the noise while riding on a snowmobile without hearing protection could possibly lead to hearing loss. However, the noise of nearby or passing snowmobiles is not of the intensity or duration to cause hearing loss.	
COMMENT: A forest wildlife researcher Robin Harrison has reported that under usual wild land conditions, snowmobiles are undetectable at distances of 750 feet.	
RESPONSE: Please see earlier response in regards to the "February/March 2000 study."	
COMMENT: There is a serious flaw in the Assumptions and Methodologies in regards to Natural Quiet [Vol. 1, page 171] and how the 78dB level for snowmobiles is compared to other vehicles. In this section, snowmobiles are compared to snowcoach sound levels at "60 to 70 dB at 50 feet" and to shuttle buses at "60 to 70 dB at 50 feet". Likewise in Table 15 [Vol. 1, page 128], an average car is listed as "60 to 70 dB at 40 mph @ 50 feet" and a diesel truck is listed as "80 dB at 40mph @ 50 feet". The 78dB sound level for snowmobiles is "at 50 feet at full throttle". First, the sound levels for snowcoaches, shuttle buses, cars and diesel trucks will be significantly higher than stated if they, too, are operated at full throttle. Second, snowmobiles are not allowed to operate at full throttle in the parks given the 45 or 35 mph speed limits, so their real operational sound level is significantly lower than 78dB. This discrepancy must be corrected before there can be any serious discussion as to whether or not a lower sound level law for snowmobiles should be established, and just how much lower would be appropriate as compared to other transportation methods.	

NATURAL QUIET

RESPONSE:

The 74 dB full throttle level refers to the test procedure in 36 CFR 2.13. In the FEIS, a level of 74 dBA at 50 feet, which was measured for a cruise speed of 40 mph, was used in the analysis. Cruise conditions were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

COMMENT:

Despite this strong policy guidance and allowance for the human ear to measure natural quiet, the Park Service has failed to collect useful data on noise pollution in the parks. The data presented appears to be erroneous. Table 42 (p. 192, DEIS) estimates snowmobile noise from a group of 10 machines extending only 4500 feet. This data does not account for cumulative noise effects or individual sensitivities to noise beyond decibel recognition (e.g. effects of different frequencies). The DEIS also sets the natural ambient sounds as high as 30dB. This presumption is made in the absence of any real data concerning natural quiet in Yellowstone Nation seems likely that the low-end ambient to be protected and restored in winter is closer to 10-15 decibels.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Noise levels are measured on a logarithmic scale such that for every 3dB rise the sound energy is doubled. Thus the noise level given off by a pair of snowmobiles will actually be double that of the 70dB level.

RESPONSE:

The first statement is correct. However, doubling the sound energy only adds 3 dB to the initial level (using the example given, going from 70 to 73 dB), a difference that is just noticeable to someone listening for it. A 10 dB increase, roughly produced by 10 identical snowmobiles passing at the same time, would typically be perceived as being "twice as loud" as a single snowmobile.

COMMENT:

We disagree with the statement on page 129 that "there are aviation policies in place to minimize aircraft overflights on the national parks." These policies are voluntary guidelines only.

RESPONSE:

The statement was deleted from the FEIS.

COMMENT:

We also question the Existing Sound Environment section on page 128-129 including Table 16, wherein the background sound levels in the parks are reported to be 25-34 dB. Is the equipment used in the Bowlby study able to measure low-level ranges of sound? Were valid (and accepted) scientific methods used to determine these reported background levels?

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

The Grand Canyon environmental assessments use a metric known as Percent Time Audible (%TA). What is the %TA for snowmobiles or for snowcoaches along the road from West Yellowstone to Old Faithful? What are the ranges of the %TA in the parks? Is there any published data associated with the DEIS regarding %TA?

NATURAL QUIET**RESPONSE:**

The February/March 2000 study undertaken as part of the revision of the DEIS measured and calculated sound levels in the presence and absence of human-generated intrusions at eight different sites in the parks. Additionally, audibility logging of natural and human-generated sounds was conducted at each site. Please see the discussion in Chapter III under Natural Soundscape for these results, including the revised natural background sound levels used in the FEIS analysis. Distances to the limits of audibility for different types of individual vehicles are presented for open and forested terrain for quiet and average background conditions in Chapter IV under Effects Common to All Alternatives. The results of the subsequent calculations are presented in Chapter IV in the sections on the impacts of implementing each alternative; included are tables of acreage in the parks where vehicles would be audible for different amounts of time.

The 1994-1996 in GTNP data and the 2000 YNP/GTNP data were used in the FEIS for computer modeling, by one-third octave frequency bands, of the distances to the limits of audibility for different types of individual vehicles for open and forested terrain under quiet and average background conditions. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

COMMENT:

Sound levels for snowmobiles within the park are tested at "full throttle," even though snowmobiles are not permitted to travel at more than 45 mph, and certainly are not allowed to operate at full throttle. Other vehicles are tested at 40 mph. These testing procedures should be standardized.

RESPONSE:

The 78 dB full throttle level refers to the test procedure in 36 CFR 2.18. In the FEIS, a level of 74 dBA at 50 feet, which was measured for a cruise speed of 40 mph, was used in the analysis. Cruise conditions were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

New Information (Natural Quiet)**COMMENT:**

The Park Service at Yellowstone has received visitor complaints that snowmobiles can be heard at Shoshone Lake, about two and half miles from snowmobile traffic, and also at Heart Lake, which is almost six miles from snowmobile access.

RESPONSE:

The 1994-1996 in GTNP data and the 2000 YNP/GTNP data were used in the FEIS for computer modeling, by one-third octave frequency bands, of the distances to the limits of audibility for different types of individual vehicles for open and forested terrain under quiet and average background conditions. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

COMMENT:

A recent poll conducted by Colorado State University found that 95% of Americans rated the protection of natural peace and sounds as either somewhat or very important.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

NATURAL QUIET**COMMENT:**

The sounds and silences of nature are among the intrinsic elements which combine to form the natural environment. Natural sounds amidst intervals of stillness are inherent components of the "scenery and the natural and historic objects and the wildlife" within National Parks. Visitors to National Park System units have a right to experience all of the natural environment unimpaired. Within units of these Systems, natural quiet - the extended opportunity to experience simply natural sounds amid periods of deepest silence - must be preserved for the enjoyment and inspiration of present and future generations.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

COMMENT:

NPS' "Natural Quiet" section does state important principles and description. However, it would be greatly improved by drawing upon the extensive scientific research, analysis and literature of the past 10 years at Grand Canyon National Park (GCNP) with respect to natural quiet vs. air tour noise. It could be improved still further through examination of the newly published, detailed studies on ambient natural quiet at Everglades National Park (see References.)

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

In the Greater Yellowstone Coordinating Committee draft report on winter visitor use in the Greater Yellowstone Ecosystem, conflict areas between motorized and nonmotorized users both within and outside of the Yellowstone and Grand Teton National Parks are identified (GYCC 1997). This information, in concert with visitor use survey data provided by Littlejohn (1996, 1996a), demonstrates that conflicts between motorized and nonmotorized users occur and are critical in influencing public use and enjoyment of our National Parks. For example, in her 1995 winter surveys of Yellowstone and Grand Teton visitors, Littlejohn documented that the noise, pollution, and number of snowmobiles was frequently reported by survey respondents as what they liked least about their experience in Yellowstone and Grand Teton. Similarly, a recent survey in Grand Teton conducted for the Teton County Commission found that 96 percent of survey respondents thought snowmobiles had a negative impact on Grand Teton because of noise, pollution, disturbance to wildlife and habitat, and due to conflicts with skiers ("Group Discusses Parks' Winter Use," Casper Star Tribune).

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

NATURAL QUIET**COMMENT:**

Opposition to snowmobiles by other Park users was critical in the decisions made by the National Park Service to close Glacier and Lassen Volcanic National Parks to snowmobile use. In Lassen Volcanic National Park, for example, "most skiers who were interviewed indicated that they would rather not have snowmobiles on the same routes, while virtually all snowmobilers indicated that they felt there was no conflict." (September 13, 1985 memorandum from Western Regional Director to National Park Service Director). In Glacier, a briefing statement prepared by the Park Service on snowmobile use indicated that "over 90% of the comments opposed to snowmobile use related that concern to silence, tranquility, or in other words, aesthetics. Because aesthetics are an emotion, a feeling, it is impossible to quantify. However, it is a very valid concern, and the National Parks represent, above all other values, an emotion, a feeling, which Americans can obtain only in a handful of other natural scenic places."

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

COMMENT:

Do you agree that YNP should set its own air quality and sound level standards?" Seven said yes. 411 said no.

RESPONSE:

YNP does not have the authority to set its own sound level standards for vehicles. It can, however, limit the types of vehicles entering the park, which is being addressed by the alternatives under study.

Clarification (Natural Quiet)**COMMENT:**

Thus, the citation on "Page 78, regarding 'What is Natural Quiet?'" should further key it as "Conclusion 3.2. I. "To this, in the Final EIS, furthermore please add and cite the following key "bullet", taken from Conclusion 3.4 of the same NPS Report, namely, that the quiet to be preserved/restored is "the quiet at the lower end of the ambient sound level range that occurs regularly between wind gusts, animal sounds, etc., not just the average sound level.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study" and the "1994-1996 GTNP data and the 2000 YNP/GTNP data."

COMMENT:

Sierra Club disagrees with the implication on Page 129, paragraph 2, that "aviation policies in place" actually minimize" aircraft overflights of the national parks. At best, they mitigate these intrusions somewhat These policies are voluntary guidelines only. They are frequently violated by low-flying-general aviation, even airtours (!), as at Grand Canyon, Bryce, Canyonlands, and other national parks. High altitude commercial and private jets, and other general aviation, produce plenty of audible noise intruding into many otherwise quiet Western national parks. Yellowstone being no exception. This needs to be acknowledged and scientifically assessed. The substantial amount of aviation noise is exponentially increasing with the growth of the industry.

RESPONSE:

The statement was deleted from the FEIS.

NATURAL QUIET**COMMENT:**

The instrumentation appears to likely have been too imprecise or insensitive to accurately measure ambient ranges of 0 to 25 decibels, certainly in comparison to the newly available NPS equipment. Most of the findings for this low-end range appear to be anecdotal or casual. Thus assertions or implication that the natural winter low-end ambient is of the order-of 30 decibels simply cannot be taken seriously, given the absence of more systematic studies/analyses such as those carried out recently at the Grand Canyon or the Everglades.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

It appears likely from those that the low-end ambient to be protected/restored in winter-season Yellowstone is often much lower-10 or 15 decibels. Table 16, "Background Sound Level," therefore needs to be re-calculated now and adaptively as more detailed data becomes available. It's title probably also should be changed, to "Background Natural Ambient", and appropriately footnoted. This will reflect the NPS finding of Conclusion 3.4 in its 1995 Report as cited above.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Pages 171-172 thus need considerable re-working. "Per Cent Time Audible" (%TA) is a key metric routinely used in the FAA/NPS Grand Canyon environmental assessments, but it has not been demonstratively chartered or mapped for Yellowstone with reference to the current deluge of snowmobiles.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

The implication that it was so calculated, in either the Friemund et al. (1997) or in the Borri et al. (1999) studies, appears at best careless. At worst it is a deliberate falsification of the record. Such calculations or charting are not published in either report, in any case, certainly not in this Draft EIS.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Annoyance levels for various levels of %TA and attitudes about natural quiet might better be determined, not mostly from the snowmobile users themselves (as in the Freimund et al but from a cross-section of the people visiting, or who potentially might visit, snow-bound parks (for example, Grand Canyon or Yosemite or Glacier) where snowmobiles are not currently admitted. It can be hypothesized that winter snowmobile users (as with summer motorcyclists) would, a whole be less concerned with the noise environment of the park, compared with other potential or actual users. The natural quiet thus becomes devalued, to the detriment of others more fully attuned to Yellowstone's uniquely hushed, high-fidelity winter landscape and soundscape.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

Please see earlier response in regards to the "February/March 2000 study."

NATURAL QUIET**COMMENT:**

The natural "low-end" ambience has been erroneously inflated to as high as 30 dB. Tables 42-43 thus need to be recalibrated to reflect the actual (lower) ambient. The same holds true for Table 47 on Page 214 for alternative B, and so on. Furthermore, can %TA now be provided for various sites along, and at various distances from, each snowmobile or snowcoach route?

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Given the examples provided it would appear that these new regulations would reduce the sound emissions of snowmobiles from 78 to 70 decibels (a large truck to a normal car), it is also said that the decibel levels are based on the snowmobile at full throttle at 50 feet. What is not mentioned is how this is intended to be regulated.

RESPONSE:

The 78 dB full throttle level refers to the test procedure in 36 CFR 2.18. In the FEIS, a level of 74 dBA at 50 feet, which was measured for a cruise speed of 40 mph, was used in the analysis. Cruise conditions were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape. Also, regulation of the limit is provided for in 36 CFR 2.18. A new regulation will be written as needed depending on the chosen alternative.

COMMENT:

More research on snowmobile sound within the parks is needed before regulations are developed.

RESPONSE:

The 78 dB full throttle level refers to the test procedure in 36 CFR 2.18. In the FEIS, a level of 74 dBA at 50 feet, which was measured for a cruise speed of 40 mph, was used in the analysis. Cruise conditions were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

I also question the Existing Sound Environment section on page 128-129 including Table 16, wherein the background sound levels in the parks are reported to be 25-34 dB. Is the equipment used in the Bowlby study able to measure low-level ranges of sound? Were valid (and accepted) scientific methods used to determine these reported background levels? I feel that the Park Service should use a more systematic study, such as those done recently in Grand Canyon or Everglades Parks, to establish accurate natural ambient background sound levels.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Despite the regulations in place to control snowmobile noise emissions -- regulations which may or may not be effectively enforced -- snowmobiles create substantial amounts of noise which is not only potentially damaging to the snowmobile operator, but which also may adversely impact wildlife and nonmotorized park users. Depending on a number of factors, including topography, vegetation structure, wind direction, a nonmotorized user who wants to truly experience natural quiet may need to move several miles from the snowmobile routes before the roar of snowmobile engines is no longer discernible.

NATURAL QUIET	
RESPONSE:	Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.
	Please see earlier response in regards to the "February/March 2000 study."
NATURAL QUIET — ENVIRONMENTAL CONSEQUENCES	
<i>General (Natural Quiet)</i>	
COMMENT:	Yellowstone's natural sound in winter must be guarded from degradation.
RESPONSE:	The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.
<i>Analysis (Natural Quiet)</i>	
COMMENT:	The DEIS is severely flawed and inadequate for the following reasons: It fails to comprehensively evaluate the impacts of snowmobile use on park wildlife, air and water quality, vegetation, serenity and solitude, ecology, park habitats, and nonmotorized users.
RESPONSE:	The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.
	Please see earlier response in regards to the "February/March 2000 study."
COMMENT:	The DEIS is severely flawed and inadequate for the following reasons: It fails to comprehensively evaluate the impacts of snowmobile use on serenity and solitude.
RESPONSE:	Please see earlier response in regards to the "February/March 2000 study" and the "1994-1996 GTNP data and the 2000 YNP/GTNP data."
COMMENT:	Without scientific data supporting the emission and noise issue, banning snowmobiles in the Grand Loop in West Yellowstone would be a dreadful decision by National Park Service.
RESPONSE:	Please see earlier response in regards to the "February/March 2000 study" and the "1994-1996 GTNP data and the 2000 YNP/GTNP data."
COMMENT:	DEIS fails to comprehensively evaluate the impacts of snowmobile use on park serenity and solitude.

NATURAL QUIET	
RESPONSE:	Please see earlier response in regards to the "February/March 2000 study."
COMMENT:	Requiring sound levels below a set limit with a snowmobile running at full throttle vs. at the Park's set speed limit of 45 mph [misrepresents the facts].
RESPONSE:	The 78 dB full throttle level refers to the test procedure in 36 CFR 2.18. In the FEIS, a level of 74 dBA at 50 feet, which was measured for a cruise speed of 40 mph, was used in the analysis. Cruise conditions were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.
COMMENT:	What will the noise pollution impact of these vehicles be on the Park and animals? How will the animals deal with the plowing of roads and the high snow banks?
RESPONSE:	Please see earlier response in regards to the "February/March 2000 study."
	Regarding animals, please refer to the Effects Common to All Alternatives section of Chapter IV of the FEIS for the results of a brief literature review of noise effects on wildlife and for discussions on the effects of snow banks on animal travel.
COMMENT:	Specifically, I noticed some discrepancy in the amount of concern that seemed to be placed on the issue of noise pollution and the amount of discussion that was given to it in the body of the paper as well as in the alternatives.
RESPONSE:	Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.
	Please see earlier response in regards to the "February/March 2000 study."
COMMENT:	Transferring the noise and pollution to these three entrances [north, south, and east] will most likely increase noise and pollution in the park as a whole.
RESPONSE:	Please refer to the sections on the effects of each alternative in Chapter IV. In particular, the tables show the acreage change in audibility by road segment. The Noise Appendix also shows audibility distances by road segment for each alternative.
COMMENT:	We should put that 70-decibel limit on that rotary plow that's going to plow that road all the way into the park.
RESPONSE:	While the plow trucks used for alternatives B and C would introduce their own noise into the park environment, they would be operating much less frequently than the current snowmobile usage or the proposed snowcoach or bus usage. As a result, plow truck noise was not modeled in the FEIS analysis.

NATURAL QUIET**COMMENT:**

If you put a 70-decibel limit on cars, we would not be able to have a Cummins diesel truck, a Ford power stroke truck or any of the other vehicles go into the park either.

RESPONSE:

Commercial trucks are not permitted in the parks other than to service the parks. According to recent Federal Highway Administration data, a bus would not exceed 80 dB (at 50 feet) until its speed was 60 mph or higher (Menge 1998). At more typical speeds in the parks, the bus noise level at 50 feet would be 75 dB or less. Additionally, one bus would replace as many as 40 individual cars or snowmobiles. Also, there are no plans to put sound level limits on cars.

COMMENT:

There is no guarantee that the air quality and noise reduction benefits associated with the imposition of these very modest standards will not be outweighed by increases in the number of motorized machines using the parks.

RESPONSE:

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

COMMENT:

The analysis of effects on Natural Quiet should include reference to the number of people who both come to the park with the expectation of experiencing natural quiet and engage in activities that might afford them the opportunity to realize that expectation.

RESPONSE:

Please see the Visitor Experience sections in Chapter IV of the FEIS.

COMMENT:

Again, on page 232, the first paragraph on "Natural Quiet" demonstrates no mention of the noise levels generated by mass transit buses, plows or individual vehicles under alternative B. The same is true for your sound analyses on page 306, Table 46 and page 200, Table 35. Your conclusion on page 307 again ignores the sound levels produced by the proposed activities of alternative B.

RESPONSE:

Chapter IV of the FEIS includes buses and automobiles/vans in the noise analysis. Also, while the plow trucks used for alternatives B and C would introduce their own noise into the park environment, they would be operating much less frequently than the current snowmobile usage or the proposed snowcoach or bus usage. As a result, plow truck noise was not modeled in the FEIS analysis.

COMMENT:

The sound frequency of automobiles and buses is lower than sound frequency of snowmobiles, so the sound of buses and automobiles travels farther than the sound of snowmobiles. The EIS must further analyze the sound impacts of buses and automobiles.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study" and the "1994-1996 GTNP data and the 2000 YNP/GTNP data."

Chapter IV of the FEIS includes buses and automobiles/vans in the noise analysis. Also, while the plow trucks used for alternatives B and C would introduce their own noise into the park environment, they would be operating much less frequently than the current snowmobile usage or the proposed snowcoach or bus usage. As a result, plow truck noise was not modeled in the FEIS analysis.

NATURAL QUIET**COMMENT:**

Snowmobile use has led to inescapable noise through YNP, GTNP and the Parkway. The effect of this noise is stress to winter-worn wildlife and, to other visitors, the loss of the stillness, solitude and natural quiet that they came to enjoy.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Regarding animals, please refer to the Effects Common to All Alternatives section of Chapter IV in the FEIS for the results of a brief literature review of noise effects on wildlife.

Regarding animals, please refer to the Effects Common to All Alternatives section of Chapter IV in the FEIS for the results of a brief literature review of noise effects on wildlife.

COMMENT:

The analysis of noise impacts in the Draft EIS is entirely deficient.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

Assumptions in Analysis (Natural Quiet)**COMMENT:**

Plowing the road would be done with large diesel powered snowblowers and blades-does this not also pollute the atmosphere, both with pollutants and noise?

RESPONSE:

While the plow trucks used for alternatives B and C would introduce their own noise into the park environment, they would be operating much less frequently than the current snowmobile usage or the proposed snowcoach or bus usage. As a result, plow truck noise was not modeled in the FEIS analysis.

COMMENT:

The decibel level of 70db that is mentioned in alternative B, I believe is not attainable with current technology. The normal outdoor noise is between 55db and 65 db (This is considered totally quiet). An air-conditioned room is between 60 and 65db. A person speaking in the room would be 65 to 75db. All snowmobiles must pass the Society of Automotive Engineers (SAE) J192 test. They can be no louder than 78db at full throttle and acceleration. In controlled test a Ford F-250 Power Stroke Diesel 4x4 pickup tested at 77.7db and a Chevrolet K1500 350 gas engine 4x4 pickup tested at 77.1 db, as tested by the SAE J192 test procedure. I am sure that new tests are being conducted in the summer months on the cars, pickups, motor homes, and buses that enter the park. The dB level is very high on these units. If the dB level is going to be set at 70dB, then this is going to restrict a large number of summer visitors to the park also.

NATURAL QUIET**RESPONSE:**

Recent research has demonstrated the ability to reduce snowmobile noise by means that include use of a four-cycle engine. The proposed alternatives represent programmatic plans. Reduced oversnow vehicle noise levels would be implemented over time, as described for the appropriate alternatives, giving industry time to respond to the requirements. Also, studies in YNP and GTNP have shown that natural background sound level is often below 25 dB. A 55-65 dB sound level is not totally quiet, but is typical of levels in the presence of noise sources (zero dB is the threshold of hearing). The purpose of this analysis is to evaluate winter use options and their potential effect on the parks. The summer uses of the park involve different circumstances and therefore would have to be evaluated separately.

COMMENT:

Natural quiet is a third concern listed in the DEIS, but this is important to only the 1% of the cross-country skiers who enter through West Yellowstone (Pg. 217). These are not indicators of a critical need to make drastic changes in winter recreation use.

RESPONSE:

Page 217 of the DEIS only indicated that less than 1% of the users entering through West Yellowstone were skiers, not that less than 1% of the skiers felt natural quiet to be important.

COMMENT:

A diesel truck or bus going 40 mph turns out 80 decibels at 50 feet! Let's make the standards equal instead of singling out snowmobiles for special restrictions.

RESPONSE:

Commercial trucks are not permitted in the parks other than to service the parks. According to recent Federal Highway Administration data, a bus would not exceed 80 dB (at 50 feet) until its speed was 60 mph or higher (Menge 1998). At more typical speeds in the parks, the bus noise level at 50 feet would be 75 dB or less. Additionally, one bus would replace as many as 40 individual cars or snowmobiles.

COMMENT:

The assumption for instituting draconian sound measures for snowmobiles under alternative B is flawed. The flaw in the assumption is that 36 CFR 2.18 requires that snowmobiles be operated at full throttle, but most snowmobiles are not being operated at full throttle.

RESPONSE:

The 78 dB full throttle level refers to the test procedure in 36 CFR 2.18. In the FEIS, a level of 74 dBA at 50 feet, which was measured for a cruise speed of 40 mph, was used in the analysis. Cruise conditions were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts – Natural Soundscape.

COMMENT:

I do not feel noise pollution is a viable argument for curtailing/eliminating snowmobiling in Parks.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

NATURAL QUIET**COMMENT:**

Reference to the sounds and emission levels of snowmobiles in a context that suggest these machines have a place in the Park, provided they can be rendered less obnoxious. But I would contest this proposition: on this understanding of federal rules and general park objectives.

RESPONSE:

Please see the previous response.

Clarification (Natural Quiet)**COMMENT:**

Has there been any attempt to reduce the noise emitted from the snowmobiles?

RESPONSE:

Recent research has demonstrated the ability to reduce snowmobile noise by means that include use of a four-cycle engine. The proposed alternatives represent programmatic plans. Reduced oversnow vehicle noise levels would be implemented over time, as described for the appropriate alternatives, giving industry time to respond to the requirements.

COMMENT:

I would also like to take to task the idea that they want to have sound levels for the snowmobiles, but in their mass transit vehicles, they have not addressed how they are going to limit these for noise.

RESPONSE:

Sound level limits for oversnow mass transit vehicles do apply for the "clean and quiet travel" alternatives and were used in the sound level and audibility calculations in Chapter IV. Also, one mass transit vehicle would replace many individual cars or snowmobiles. Also, The February/March 2000 study undertaken as part of the revision of the DEIS measured and calculated sound levels in the presence and absence of human-generated intrusions at eight different sites in the parks. Additionally, audibility logging of natural and human-generated sounds was conducted at each site. Please see the discussion in Chapter III under Natural Soundscape for these results, including the revised natural background sound levels used in the FEIS analysis. Distances to the limits of audibility for different types of individual vehicles are presented for open and forested terrain for quiet and average background conditions in Chapter IV under Effects Common to All Alternatives. The results of the subsequent calculations are presented in Chapter IV in the sections on the impacts of implementing each alternative; included are tables of acreage in the parks where vehicles would be audible for different amounts of time.

COMMENT:

On page 196, last paragraph concerning quiet and solitude. It states that most of the survey respondents felt this was important to the quality of their park visit and that many visitors responded that they were somewhat dissatisfied with their ability to experience this. Were the many visitors snowmobilers or other visitors?

RESPONSE:

The survey was applied to representative percentages of winter users, thus the majority were snowmobilers. However, a survey about winter activities was also conducted in the summer, and regional and national telephone surveys were also conducted, as reported in the FEIS.

COMMENT:

In the NPS' view, does snowmobile noise also contribute to weakening of wilderness values to the point that park areas may not qualify to be preserved in the Wilderness Area Preservation System due to noise intrusions?

RESPONSE:

No, it does not, because noise is not an irreversible impact.

NATURAL QUIET**COMMENT:**

So, even with the "noise" of snowmobiles removed from this area, visitors still will not have solitude?

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study" and the "1984-1996 GTNP data and the 2000 YNP/GTNP data."

COMMENT:

What is the %TA for snowmobiles or for snowcoaches along the road from West Yellowstone to Old Faithful? What are the ranges of the %TA in the parks? Is there any published data associated with this DEIS regarding %TA metrics?

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Concerning the preferred alternative: What is the definition of "Natural Quiet"? If man is present can there be such a thing?

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

COMMENT:

What about my right to quiet?

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

Methods (Natural Quiet)**COMMENT:**

Since so many of the people involved in this study were concerned with noise it surprised me just how little it was actually addressed.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

The methodology of studying social recreational values is available but not disclosed by the DEIS. In other words, the DEIS desires natural quiet but fails to justify its existence in areas of access to all visitors.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

COMMENT:

NPS has clearly misunderstood the function of a decibel rating by requiring snowmobiles be at 70 decibels (currently they operate at 78). 70 is actually half as loud as 78; this requirement is unrealistic and unmatched by requirements for any other vehicles (including busses).

NATURAL QUIET**RESPONSE:**

Recent research has demonstrated the ability to reduce snowmobile noise by means that include use of a four-cycle engine. The proposed alternatives represent programmatic plans. Reduced over-snow vehicle noise levels would be implemented over time, as described for the appropriate alternatives, giving industry time to respond to the requirements.

Commercial trucks are not permitted in the parks other than to service the parks. According to recent Federal Highway Administration data, a bus would not exceed 80 dB (at 50 feet) until its speed was 60 mph or higher (Menge 1998). At more typical speeds in the parks, the bus noise level at 50 feet would be 75 dB or less. Additionally, one bus would replace as many as 40 individual cars or snowmobiles. Also, a ten-decibel reduction is typically considered half as loud as the original sound.

COMMENT:

Annoyance levels for various levels of % TA, and attitudes about natural quiet would be better determined from a greater cross-section of POTENTIAL wintertime park users. There are a lot of people who refuse to use the park due to the snowmobile situation and this is not reflected in this data. It is not a stretch to assume that snowmobile users would not be as concerned about noise levels as perhaps someone more in tune with the natural quiet who may wish to visit the park but is forced to seek their solitude elsewhere due to the current situation in YNP and GTNP.

RESPONSE:

The survey was applied to representative percentages of winter users, thus the majority were snowmobilers. However, a survey about winter activities was also conducted in the summer, and regional and national telephone surveys were also conducted, as reported in the FEIS.

COMMENT:

Not only has the NPS failed to provide citations for some of its alleged facts, particularly a citation for a study by Bowlby and Associates which measured ambient sound levels in GTNP which forms the foundation for the noise analysis in the Draft EIS...This report, however, could not be evaluated because it was not referenced in the literature cited section of the Draft EIS.

RESPONSE:

The citations were inadvertently omitted in the DEIS and were added to the FEIS.

NATURAL QUIET — STATEMENT OF EFFECTS**General (Statement of Effects)****COMMENT:**

However, noise is not critical to those riding on snowmobiles, snowcoaches or buses since they are riding on/in a noisy vehicle anyway. Noise is critical to nonmotorized users like cross-country skiers and snowshoe hikers. At a fairly moderate pace of 2 mi./hour these people can be in a negligible noise range in 20 minutes (assuming a 5 snowmobile group in a middle ground middle ground setting) and consequently in a naturally quiet area. Here they can stay all day enjoying the quiet, returning only at nightfall. Less than 1% of the winter recreational visitors entering through West Yellowstone are cross-country skiers however (Pg. 217). And they can be out of range of motorized sound in roughly 20 minutes. In the case of noise, therefore, the benefit to the many (snowmobilers) outweighs the benefits to the few (skiers).

NATURAL QUIET**RESPONSE:**

The FEIS analysis provides recalculated distances to audibility and percentages of time that vehicles and snow machines are audible for each alternative.

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details. Also, the purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation included consideration of the number of the different types of vehicles that would be using the parks.

COMMENT:

It is seldom that anyone who skis or snowshoes from an entrance to the Parks interior. Snowcoaches and snowmobiles provide access for these nonmotorized activities. It is ridiculous to desire natural quiet next to an established road.

RESPONSE:

Preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks.

COMMENT:

Large diesel buses idling away in the winter while waiting for their passengers to return does not sound like improvement in solitude!

RESPONSE:

According to recent Federal Highway Administration data, the noise level of an idling diesel bus is around 68 dB at 50 feet (Menge 1998). In a 1996 GINP study, an idling Polaris Indy 440 snowmobile measured 56 dB at 50 feet (Bowly & Associates 1996). Thus, approximately thirteen idling snowmobiles would produce the same sound level as one idling diesel bus, which could replace as many as 40 snowmobiles. If idling bus noise is judged to be a problem, it is possible that action could be taken to require that bus engines be shut off when parked.

COMMENT:

Page 193, first bullet: This sentence appears to state snowcoaches have a larger impact on sound than do snowmobiles. This contradicts statements on the previous and other pages that show snowmobiles have a larger impact. Should snowmobiles be 2 miles and snowcoaches be 1 mile?

RESPONSE:

Snowcoach sound level data was collected in the March 2000 study in response to questions in the DEIS. The results were used in the FEIS. Please see the discussion in Chapter IV under Effects Common to All Alternatives.

Negative Effect (Snowmobiles on Natural Quiet)**COMMENTS:**

The Parks should set the standard for clean air, clean water, serenity, and solitude, they should not be playgrounds for pollution belching, loud machines which destroy air and water quality and shatter any semblance of serenity and solitude.

The air pollution, noise, and disruption to wildlife that these machines create cannot be supported by the Park Service's mandate or the Park Service's own Management Policies.

We believe Yellowstone Park is too beautiful, too unique and too wonderful to be destroyed and degraded with the noise, pollution and smell of snowmobiles.

NATURAL QUIET

I do not like the fact that the snowmobilers would have the park for 18 hours – from 5 A.M. to 11 P.M. each day. Cross-country skiers and snowshoe enthusiasts should have more quiet time.

Already, snowmobiles rumble through the trees and mountains of the park and disrupt what used to be a season of silence in a true "winter wonderland." These machines harass wildlife, contribute to noise pollution, and put more emissions into the air in one day than a car would in years.

We strongly urge the denial now and in the future for snowmobiles to be allowed in or near YNP. To destroy the beauty and quiet of this beautiful park for its visitors (and terrible disturbance to wildlife) would be an absolute outrage.

They [snowmobiles] also create excessive noise, which is the number one cause of stress according to Prevention Magazine.

The noise level and exhaust emissions just aren't in keeping with the natural beauty and character of a national park. I am apprehensive about the trip, as I really don't want to listen to noisy snowmobiles nor breathe in their exhaust.

SUMMARY RESPONSE:

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

COMMENT:

The Sierra Club supports comprehensive baseline sound level monitoring and source inventories in all NPS units, including YNP, and the establishment of appropriate noise standards.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

Out in the winter silence, listening for a bird's call or the primitive scream of its predator...it always comes as a selfish intrusion when a line of snowmobilers – it seems solitary machineers are few – come rip-roaring over a hill.

RESPONSE:

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

Negative Effect (Plowing on Natural Quiet)**COMMENT:**

By plowing these roads, your agency will only have the added burden of automobile traffic and congestion, while continuing to allow noise and air pollution from snowmobiles on other road segments.

RESPONSE:

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

NATURAL QUIET**COMMENT:**

Plowing the road from the West Entrance to Old Faithful will just make traffic, noise, and pollution problems worse.

RESPONSE:

The noise impacts are actually reduced along the plowed road segments. Please see the discussion in Chapter IV under Effects of Implementing alternatives B and D for details.

COMMENT:

The NPS preferred solution of plowing the road from West Yellowstone to Old Faithful and allowing automobiles access would destroy the winter solitude that is a prime reason for visiting in the first place.

RESPONSE:

Please see the previous response.

Negative Effect (Snowcoaches on Natural Quiet)**COMMENT:**

The older snowcoaches running on the groomed roads in the rest of the Park create significantly more noise than the snowmobiles. The first effort in noise reduction should be to muzzle these machines.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

I do not want to see snowmobiles, snowcoaches, and trail grooming in the parks for recreational purposes. They make noise and air pollution.

RESPONSE:

The purpose of the EIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

COMMENT:

My point is the snowcoach pattern does not provide solitude, natural quiet or serenity.

RESPONSE:

Please see earlier response in regards to the "February/March 2000 study."

COMMENT:

The noise and disturbance associated with snowcoaches, and especially, snowmobiles, present a clear threat to wildlife, and spoil the experience of park visitors who come to Yellowstone and Grand Teton to absorb the tranquility and wonder that these parks offer in winter.

RESPONSE:

Regarding animals, please refer to the Effects Common to All Alternatives section of Chapter IV in the FEIS for the results of a brief literature review of noise effects on wildlife.

Negative Effect (Mass Transit on Natural Quiet)**COMMENT:**

I ask you gentleman to test the busses and cars, for noise levels, at full throttle.

NATURAL QUIET

The 94 dB full-on test level refers to the test procedure in 35 CFR 2.18. In the FEIS, a level of 74 dB(A) at 50 feet, which was measured for a chain-saw of 40 feet, was used in the analysis. Only the sound levels were used for all vehicle types studied in the analysis. Please see the discussion in Chapter IV under "Assumptions and Methodologies for Evaluating Impacts - Natural Soundscapes."

Negative Effect (Visitors on Natural Quiet)**COMMENT:**

Noise levels, air pollution levels, and litter, all seem to be major problems developing because of overcrowding.

RESPONSE:

The purpose of the FEIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

Positive Effect (Plowing on Natural Quiet)**COMMENT:**

I think that it would be great to plow the road from West Yellowstone to Old Faithful. It would cut down on noise, emissions and other user conflicts.

RESPONSE:

The purpose of the FEIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

Positive Effect (Snowcoaches on Natural Quiet)**COMMENTS:**

The proposed snowcoach transportation system would allow just as many winter visitors to the parks, and air quality and natural sounds would be vastly more enjoyable.

The snowcoach shuttle service could be used very effectively to move tourists in and out of the park. This would go a long way toward limiting air and noise pollution and displacement of wildlife.

A group travel system in Yellowstone using snowcoaches only, you can imagine what a great impact it will have on the pollution and overall tranquil quality of the park.

SUMMARY RESPONSE:

The purpose of the FEIS is to evaluate several alternatives that provide a range of winter use activities while limiting conflicts within user groups. This evaluation includes consideration of the number of the different types of vehicles that would be using the parks. Also, preservation of natural soundscapes is viewed by the NPS as an important part of its mission and is reflected in the FEIS soundscape analysis. Please see the discussion on "National Park Service Regulations and Policy Excerpts on Sound and Natural Quiet" in Appendix C for more details.

Positive Effect (Mass Transit on Natural Quiet)**COMMENT:**

Group travel is a necessity that I believe most people like myself are willing to do if it will mean a quieter and more natural park.

NATURAL QUIET	
RESPONSE:	Please see the previous summary response.
Positive Effect (Limiting Snowmobiles on Natural Quiet)	
COMMENTS:	
Limiting these activities [motorized recreation] would maximize the experience of serenity and solitude when visiting the Parks.	
It is important to maintain the air quality and to control noise pollution by reducing the use of snowmobiles in Yellowstone Park.	
Limiting snowmobile use of YNP and GTNP, providing safe, noise-free environments for small and large mammals, including humans in these national parks.	
SUMMARY RESPONSE:	
Please see earlier summary response in regard to the "purpose of the EIS."	
Positive Effect (Banning Snowmobiles on Natural Quiet)	
COMMENTS:	
Snowmobiles should not be permitted within the park's boundaries, to preserve natural solitude.	
The issue there then is allowing equal numbers of people to get into these national parks but to greatly reduce the number of vehicles, and, along with it, to reduce the air pollution and the noise that are compromising these parks.	
SUMMARY RESPONSE:	
Please see earlier summary response in regard to the "purpose of the EIS."	
No Effect (Snowmobiles on Natural Quiet)	
COMMENTS:	
I think people should leave the snowmobilers alone. They don't cause as much noise and pollution as you seem to think.	
Snowmachine noise: Like other issues of esthetics in Yellowstone ... it does not in itself cause harm, its effects are transient at worst, and can be corrected if the will is there.	
SUMMARY RESPONSE:	
Please see earlier summary response in regard to the "purpose of the EIS."	
COMMENT:	
Snowmobiles can barely be heard at all.	
RESPONSE:	
The 1994-1996 in GTNP data and the 2000 YNP/GTNP data were used in the FEIS for computer modeling, by one-third octave frequency bands, of the distances to the limits of audibility for different types of individual vehicles for open and forested terrain under quiet and average background conditions. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts - Natural Soundscape.	
COMMENT:	
You also cannot hear a snowmobile 5 miles away.	
RESPONSE:	
The 1994-1996 in GTNP data and the 2000 YNP/GTNP data were used in the FEIS for computer modeling, by one-third octave frequency bands, of the distances to the limits of audibility for different types of individual vehicles for open and forested terrain under quiet and average background conditions. Please see the discussion in Chapter IV under Assumptions and Methodologies for Evaluating Impacts - Natural Soundscape.	

COMMENT:

Third, projected impacts are misleading. The NPS readily admits huge gaps exist for most impact areas, and many if not all of the impacts associated with existing uses and various alternatives are unknown.

COMMENT:

The DEIS has not accurately or sufficiently considered the impact of this alternative [B] on the resource.

COMMENT:

Alternative D does not cover the multi-use paradigm that I believe is necessary to adequately protect the areas resources. The major problem that I have with this alternative is waiting until 2007-2008 to put the sound rules in effect.

COMMENT:

Another thing that I feel would greatly improve the proposal is if more emphasis of the actual results on wilderness and wildlife presented by noise pollution were addressed.

SUMMARY COMMENT:

Don't cars, buses, trucks and SUVs have a greater impact than snowmobiles?

COMMENT:

Evidence inconclusive as to snowmobiles causing damage.

SUMMARY COMMENT:

The impact analysis regarding snowmobiles and grooming was insufficient and did not document the "hidden costs" of the effects on park resources and nonmotorized users.

COMMENT:

I strongly recommend that intensive studies are begun immediately to assess what effect this [winter] use is having on the native plants and animals within the entire GYE.

SUMMARY COMMENT:

Concerns were expressed over the effects of pollution on the environment.

COMMENT:

In chapter four under effects on natural resources you write an increase in winter visitation would result in minor adverse impacts on geothermal features near roads, staging and destination areas. These impacts may be long term.

COMMENT:

Does the NPS have the resources to carry out a monitoring plan that is sensitive to detect adverse impacts, or will only gross deterioration be detected under the monitoring plan?

NATURAL RESOURCES

REMARKS:

Especially given the impact area, a variety of methods will be used to measure the effects of various activities. Available technology largely determines the main impact which effects can be detected. See the FEIS for a discussion of the monitoring plan.

COMMENT:

Concerning the preferred alternative: I would like to know how much damage has been done to date by approx. 25 years of snowmobiling?

RESPONSE:

The effects of snowmobiling on natural resources are discussed for each alternative in the FEIS.

SUMMARY COMMENT:

General expressions of support for or in opposition to: grooming; snowmobiles; snow machines; plowing; regulating backcountry use; the number of visitors, and mass transit.

SUMMARY RESPONSE:

Comments noted. Responses of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. People who commented in this fashion are asked to consider that there is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.

PUBLIC HEALTH

General (Snowmobile Emissions Exposure)**COMMENTS:**

Not only is human health, including the health of park officials and snowmobilers compromised by exposure to such poisons, but these chemicals can adversely impact the fish, amphibians, mammals, birds, and vegetation in National Parks through acid rain, or when flushed into the aquatic system upon snowmelt.

Human Health Risks Associated with Carbon Monoxide and NPS Responsibility to Protect Public and Employee Health:

The blue haze found along snowmobile corridors, trailheads and gas stations contains not only dangerous levels of airborne toxins, but can lead to the formation of additional ground level ozone from the photochemical reaction of released nitrogen and hydrocarbons. Health risks associated with exposure to smog and nitrogen include respiratory complications such as coughing. Chest pain, heart problems, asthma, concentration lapses and shortness of breath. Elderly individuals and children are particularly sensitive to ground level ozone and nitrogen.

In Yellowstone, concern about public health and excessive snowmobile pollution were issues raised in over 1,200 snowmobile complaint letters received by the park in 1993 and 1994. As a result, Yellowstone began to study snowmobile emissions and soon found that CO and PM concentrations were big enough to cause health and air quality concerns in West Yellowstone, along the snowmobile trail to Old Faithful, and in the parking lot at Old Faithful (Park Service Air Quality Division 1995). In addition to adverse pollution impacts on visitors, Yellowstone has been forced to enclose ranger booths at its West Entrance to protect rangers from dizziness, nausea, fatigue, headaches, and breathing problems. Filtered air is pumped into entrance kiosks where rangers have reported difficulty counting change. Park visitors have reported tasting the visible haze which surrounds busy entrances and trailheads.

Carbon monoxide is particularly dangerous because it binds to the hemoglobin in blood (forming carboxyhemoglobin) and renders hemoglobin incapable of transporting oxygen (Snook-Fussell 1997). Elevated levels of carboxyhemoglobin can cause neural-behavioral effects at lower levels (2-3 percent), headaches and fatigue (10 percent), and respiratory failure and death at higher levels. And the general consensus among medical professionals is that the health risk from CO increases at high altitude -- a risk exacerbated by richer fuel mixtures common at higher elevations. CO is particularly hazardous during pregnancy, and to the elderly, and children.

The National Ambient Air Quality Standards for CO of 35 ppm for 1 hour and 9 ppm for 8 hours were established to keep blood levels of carboxyhemoglobin below 3 percent. Notably, some scientists have criticized these standards because of evidence of adverse health effects even at these levels (Watson 1995, Greek and Dorweiler 1990).

STAKEHOLDERS' RESPONSES:

The recognition of health and welfare effects of the critical pollutants, which include carbon monoxide, ozone, nitrogen dioxide, particulate matter, and sulfur dioxide, and lead, from the point of the source of the primary (exhaust) and secondary (acid rain, smog, and ozone) pollutants, and the resulting health and welfare effects.

Facts or Data (Snowmobile Emissions Exposure)**COMMENT:**

While the DEIS indicates that studies have shown that exhaust emissions have been found deposited in the snow near roadways, no indication is presented that the levels of deposition are having any adverse impacts on streams or the surrounding environment.

RESPONSE:

Unburned exhaust emissions from conventional snowmobile engines are not harmful to the environment.

COMMENT:

Apparently your air quality sampling methodologies are wrong, thus bringing down the credibility and trust of the YNP officials.

PUBLIC HEALTH

RESPONSE:

A variety of air quality sampling methods have been reported in studies by researchers at YNP to better understand air quality trends. In addition, comparative results from air dispersion modeling using EPA approved models will be included in the FQIS.

SUMMARY COMMENT:

Proper data supporting any drastic cutback in emissions must be supported by scientific data. Simply citing statistics for West Yellowstone's entrance stations isn't sufficient. Your numbers are based on old information and errant reporting of emissions produced by snowmobiles.

SUMMARY RESPONSE:

An FQIS is not, per se, a scientific analysis. The most recent engineering and scientific data were used in contrast of time and resource available. The results of additional technical analyses (e.g., air dispersion modeling) are to be included in FQIS.

COMMENT:

For the most part, air quality is good and there is no evidence of people getting sick from air pollution, other than an occasional employee at West entrance. Presumably this situation could be mitigated by limiting exposure and by moving the check point out from under the enclosed entrance at West where fumes can be trapped.

RESPONSE:

The O&A cites over 1,200 visitor complaint letters received in 1991-94 relating to snowmobile nuisances and results of preliminary carbon monoxide sampling conducted in 1996 that raised health concerns.

COMMENTS:

There is an estimate that 60,000 dirty two stroke engines dump over 100,000 gallons of unburned gas and more than 2,000 gallons of raw oil into the soil of the park.

It is estimated that the dirty two-stroke engines of the 60,000 snowmobiles that enter YNP dump over 100,000 gallons of unburned gas, and more than 2,000 gallons of raw oil into the park's environment.

SUMMARY RESPONSE:

Estimation on the total quantity of gasoline and oil that are released as unburned fuel in the park is speculative.

COMMENT:

Australian research companys (sic) as well as a German company have invented direct injection snow mobile 2-cycle engines that put out 75% less pollution emissions than the present ones.

RESPONSE:

The emergence of cleaner burning two-stroke snowmobile engines is notable. However, the extent of emissions reductions and the timing of introduction into commerce in large numbers are unknown.

COMMENT:

Snowmobilers, rangers and other park visitors are exposed to dangerous levels of CO. In Grand Teton National Park, Fussell-Snook (1997) measured the amount of CO emitted from a snowmobile on a Park trail under steady-state conditions. An average of 9.9 g/mile (95 g/hr) to 19.9 g/mile (795 g/hr) of CO was emitted by one snowmobile traveling from 10 to 40 mph. By comparison, an automobile emits 0.01 to 0.04 g/mile of CO under steady-state conditions, or approximately 1,000 times less than a snowmobile. The average CO measurements for a single snowmobile, recorded at different speeds and distances (25-125 feet), ranged from 0.5 - 23.1 ppm. The Montana state one-hour human exposure limit for carbon monoxide is 23 ppm.

PUBLIC HEALTH

RESPONSE:

The NPS is familiar with the reference cited, which is also listed in the Bibliography of the DEIS.

COMMENT: It is important to reemphasize that these measurements were based on a single snowmobile only, during steady-state conditions. Unfortunately, snowmobiles travel in packs of 2-25 units for sustained periods of time, and often accelerate over hills and banks. It is therefore clear that typical human exposure to CO is of a much greater magnitude, and represents a very significant level of toxic pollution. The results are particularly alarming for rangers and recreationists at trailheads, gas stations, and park entrances, where one hundred snowmobiles can create the equivalent carbon monoxide of more than 100,000 cars.

RESPONSE:

Additional technical analyses (e.g., air dispersion modeling) will make assumptions about the number of snowmobiles that enter on average and peak days, and results will be reported in the FEIS.

COMMENT:

As a federal employer, the NPS has the responsibility under OSHA and regulation to protect employee health. The Park Service also must perpetuate conditions in the best interest of public health. The permission of snowmobile use in the parks and concomitant impacts to air quality endanger park visitors with respiratory and other ailments and chemical sensitivities. The Park Service must provide a health environment for visitors; current snowmobile use precludes the parks' ability to ensure a clean, healthy environment for visitors and a healthy workplace for employees, as required by law.

RESPONSE:

As noted on page 3 of the DEIS, Executive Order 11644, as amended, provides direction for permitting snowmobile use in national parks in the context of protecting natural values.

COMMENT:

Page 93, Public Health, first sentence, "...increase in number of visitors...." A similar analysis is needed for the increase in snowcoaches. All the statements used to describe snowmobile emissions also apply to this type of snowcoach. For example, pre-1971 Bombardier model snowcoaches that comprised 100 to 85 percent (10 years ago to present) of all snowcoaches in Yellowstone emit much more HC, CO, and NOx than current automobiles or light trucks. These machines average 5 to 7 miles per gallon of gasoline. EPA records indicate this type of engine (pre 1971, no emission controls) emits about 1,000 grams per mile CO for the speeds traveled in the Park.

RESPONSE:

Additional technical analyses (e.g., air dispersion modeling) to be included in the FEIS include modeling emissions from snowcoaches.

SUMMARY COMMENT:

The public health and air quality sections in this DEIS really confuse ambient air quality standards and issues with personal exposure level standards and issues. These are really separate issues and need to be treated separately so that the appropriate agencies can act to resolve them. Also, the NAAQS and MAAQS were not exceeded. The NAAQS establish not just a concentration, but they also identify the monitoring methodology and the averaging time. While there is work indicating that levels above 35 PPM CO occurred for a short period at points in the park, the data referenced here are comparable to personal exposure limits (OSHA is 50 ppm CO). Personal exposure limits were not exceeded.

RESPONSE:

References to ambient air quality standards and OSHA standards will be clarified in the FEIS.

PUBLIC HEALTH

COMMENT:

Page 94, last paragraph, first sentence "Table 9" should be changed to Table 10. Both tables 9 and 10 inaccurately attribute all emissions to snowmobile traffic by listing only snowmobiles at the top of the columns, and do not include snowcoach and other vehicles. No background reading is given to account for pollution that may be coming from other sources like wood stoves or vehicles in the town. The University of Denver report also shows that snowcoach emissions are also high compared to other vehicles with 4-stroke engines. The table should be changed to include columns for snowcoaches and other (non-recreational) vehicles.

COMMENT:

The National Ambient Air Quality Standard for acceptable particulate matter is 65, not 60 as stated by the NPS. The particulate figures reported by the NPD were based on a four-hour exposure sample instead of the 24 hour standard. The NPS also mislead the public by grossly exaggerating the amount of polycyclic aromatic hydrocarbons (PAHs) in pounds instead of micrograms. The actual amount PAHs emitted is approximately .000543 pounds. This is huge error and clearly demonstrates the NPS apparent purposeful misrepresentation of the actual park air quality.

COMMENT:

"Most importantly, the DEIS fails to identify the largest variable in the air quality equation---climate at specific locations. Kado's 1999 draft final report illustrates that the West Entrance is the hot spot for Yellowstone's carbon monoxide and particulate matter sampling because of the high levels reported there compared to other sites. For another example, one street corner at a location near Yellowstone National Park has 250 times its annual average number of vehicles pass the intersection in the summer season without any deterioration in air quality. However, that same corner in the winter will have one-eighth (1/8) of its annual average annual vehicle count approach the National Ambient Air Quality Standards for carbon monoxide. The difference is the weather and dispersion of emissions." See Montana DEQ Comments.

COMMENT:

An SAE paper presented in September 1998 and May 1999 detailing the ISO snowmobile procedure (used at SWRI) with a comparison to other engine test protocols (EPA, MMA, SA-E J- 108 8)" is more accurate and 3L4 should be reviewed in the DEIS." Over \$250,000 went into development of this procedure. The real difference in emissions is how the engine is used in the field.

PUBLIC HEALTH

New Information (Snowmobile Emissions Exposure)**COMMENT:**

The findings of these studies also correlate to studies on snowmobile emissions. In a study of snowpack contamination by snowmobiles, for example, Matthew R. Graham of the University of Nevada-Reno found elevated readings of four PAHs -- acenaphthene, acenaphylene, naphthalene and phenanthrene -- in snow samples under field conditions. Graham detected levels of naphthalene, for instance, of up to 12,000 ppb. According to the Occupational Safety and Health Administration (OSHA), the short-term human exposure limit (STEL) for naphthalene is 15,000 ppb. OSHA's Health Hazard Data indicates that "contact may cause skin or eye irritation ... inhalation may cause headache, nausea and perspiration ... [and] ingestion may cause cramps, nausea, vomiting and diarrhea" (OSHA, 1996). The lowest published lethal human oral dose is 50,000 ppb.

COMMENT:

Dangerous levels of carbon monoxide (CO) and particulate matter (PM) are a primary concern. CO is extremely dangerous to humans (discussed below), and particulate matter is a recently confirmed human carcinogen by the Environmental Protection Agency. Snowmobiles emit dangerously high levels of carbon monoxide. A study conducted for the National Park Service in 1997 concluded that a single snowmobile produces 500-1000 times more carbon monoxide than a 1988 passenger car (Fussell-Snook 1997). Notably, comparisons to a current model-year passenger vehicle would increase this figure significantly.

COMMENTS:

We actually compared ten snowmobiles burning synthetic oil with ten snowmobiles burning regular oil. And a crude estimate is there's probably a 75 percent improvement in the amount of smoke you get, visible smoke you get.

Work by Castro, Rotax Engine Company, and several European universities showed that highly biodegradable, bio-based lube oils maintain over 80 percent of their biodegradable characteristics after being emitted from the engine exhaust, whereas emissions generated from partial combustion of conventional, non-synthetic, mineral lube oils increase their persistence. Over 86 percent of the emissions from Castrol's engine oil (Rotax biodegradable synthetic) were biodegraded within 50 days at 1 degree Celsius, compared to less than 3 percent for conventional fuel and lube oil emissions. The data were collected on projects in England and Germany using an ISO/ANSI method with water at 1 degree Celsius (to acquire European environmental certification). Once aware of the study results, NPS initiated the use of biodegradable lube oils. The use of biodegradable, low-emission lubrication oils for 2-stroke engines should be required of all fleets and permit holders in the parks. We recommend that their use be encouraged in private vehicles.

COMMENT:

I'm sure you are aware of the new direct fuel injecting that is on the near horizon for snowmobiles, this will make them run significantly cleaner than they do now, however I'm still not aware of any accurate data that can suggest that at present levels there is any harm being done.

COMMENTS:

The Montana DEQ now monitors the West Entrance of Yellowstone National Park. Monitoring results from February 1999 show that the MAAQS 8-hour average standard for CO (of 9 ppm CO 8-hour average) was approached. These standards could be exceeded at any time, but to date, the standards have not been exceeded.

Air quality data was only collected at the West Entrance and along the West Yellowstone, MT to Old Faithful corridor and at the West Entrance air samples were collected for only 4 days. It has been suggested that radio transmissions from the West entrance altered the air quality monitors and the readings at that entrance. No attempt was made to determine what component of air pollution was due to wood stoves and fire places versus snow machines and none of the data collection practices were reviewed by peer groups in that field. Even with these errors, the air quality at the West Entrance was never shown to be worse than the federal air quality standards and only exceeded Montana's standards during the morning hours (8-10 am) when the YNP shows that about one-third of the daily traffic volume entered Yellowstone National Park.

COMMENTS:

The Montana Department of Environmental Quality operates a monitoring station for carbon monoxide near the west entrance and a monitoring station for particulates in the Town of West Yellowstone. In 1997, the maximum 8-hour reading at the west entrance Department of Environmental Quality monitoring station was 5.9 ppm and the maximum hourly reading was 5.0 ppm. These readings compare to the 8-hour federal air quality standard for carbon monoxide of 9 ppm, which is based on the second highest reading. Therefore, the highest 8-hour reading of 5.9 ppm approached the 9 ppm standard, but the second highest reading of 5.0 ppm, which is used to compare to the standard, is well below the standard.

COMMENT:

This entire table and section should be replaced with a summary of Dr. Norman Kado's September 1999 draft final report regarding exposure levels of mechanics, kiosk employees, and patrol rangers. The measured concentrations should be compared with the applicable federal limits for comparison (50 PPM).

COMMENTS:

Dr. Kado's draft report was not available at the time the DHEIS was prepared, but will be added in the DHEIS.

COMMENT:

State officials have observed during routine trail inspections the past two winter seasons in the Gallatin Canyon that snowmobilers, nearly all non-residents, are traveling north along the highway from the Taylor Fork area. This is a termination point along the Big Sky Trail. Snowmobilers normally trailer their machines in and out of the Taylor Fork area. These snowmobilers are actually traveling on the highway surface or on the shoulder of the pavement to reach their destination, Big Sky resort, and then return to West Yellowstone via the same route. This situation is already dangerous and may become even more hazardous to the normal highway traffic and that of the snowmobilers if the preferred alternative is selected. This statement relates directly back to comments provided for the Greater Yellowstone Coordinating Committee document and Scientific Methods and Data.

PUBLIC HEALTH

These assessments are discussed in the DEIS on pages 313-315. In particular, for Montana, this point is made on page 311. It appears that the situation involving travel from West Yellowstone to Big Sky and Taylor Park and the return trip is hazardous regardless of any management decision by NPS.

COMMENTS:

Most of the high readings of carbon monoxide reported by NPS have been in close proximity to the West Entrance kiosk. A review of the NPS 1995 study data shows that the kiosk station slows air speeds much as a snowfence slows and traps snow. This slowing or stopping of air movement traps emissions around the kiosk. The situation is similar to what occurs at tollbooths, and the entrance kiosk fits EPA's definition of a tollbooth. Tollbooths with high concentrations of pollutants have reduced concentrations 35 to 73 percent by removing the roof connections between toll stations. Similarly, if the roof to the West Entrance kiosk were removed, air flow around the kiosks would be increased and vehicle emissions would be more easily dispersed. This has been discussed with Park Service personnel a number of times including an analysis in a letter from one of the engineers involved in the winter use studies in August 1997 with respect to improving the ventilation air for the kiosk workers.

Two potential management changes to improve air quality at the entrance were discussed at the West Yellowstone Winter Use meeting in early 1997, but are missing here. The first would be to move the winter entrance station 1 to 2 miles farther into the Park where air flow conditions are better. The cost was estimated at less than \$500,000, and industry representatives expressed interest in helping pay for this new entry station. If the entrance were permanently moved, air quality would also improve for summer employees and visitors. Another management technique that is being evaluated but is not discussed is the increased use of express lanes. The use of these lanes would not disrupt traffic flow, would decrease rider and employee exposure to emissions, and would eliminate emissions resulting from idling engines waiting in line. These two different management strategies need to be discussed in this DEIS, and considered as simple solutions to both ambient air quality and personal exposure concerns.

SUMMARY RESPONSE:

These suggestions are good regarding facilitating air dispersion in the kiosk area at the West Entrance, but they do not represent the final solution to air quality problems. The park is incorporating moving the entrance station as a mitigating measure in one of the alternatives. The kiosk serves a purpose for both the park and its visitors. For example, they may be the last contact point between park personnel and visitors where information on safety, air quality, snowmobile, cross-country, and other issues are shared. The kiosk also may serve several functions, including collection of fees for admission to the park, parking, and other services. The kiosk is a necessary part of the park's infrastructure and is a part of the winter use study. The winter use study is ongoing.

COMMENTS:

Public Health, Page 177, paragraph 5, last line: The paragraph should specify that only NPS and West Yellowstone rental operators use both these products. Only 5 to 6 percent ethanol blend in gasoline fuel was estimated to be used at the West Entrance in the morning (Morris, Bishop, Stedman, 1999). Yet, this produced a seven percent reduction in CO tailpipe emissions. The amount of ethanol blend in rental snowmobiles and snowcoaches is reduced from 10 percent by the amount of fuel purchased inside the Park because Yellowstone Park Service Stations, an NPS concession, do not carry 10 percent ethanol blend.

If emissions are a concern why isn't ethanol gas sold in the park year round? Will idling buses in cold weather improve the air pollution?

SUMMARY RESPONSE:

The DEIS includes a plan to sell only 10 percent ethanol blend fuel for snowmobiles and snowcoaches in the park by opening to 2000. The plan is to open to 2000.

COMMENT:

The DEIS inappropriately tries to minimize this safety record by stating that there have been several injuries and one fatality near Togwotee Pass on the CDST/US287. This is an inappropriate comparison and is in an area outside the scope of this DEIS, and therefore this comparison should be eliminated.

PUBLIC HEALTH

REMARKS:

The DEIS is intended to inform public and to discuss the park. For example, Grand Teton National Park personnel respond to winter accidents involving snowmobiles and other vehicles on the winter Pass. The sentence noting several injuries and one fatality within the park involving snowmobiles and automobiles is an observation regarding past experience in the immediate area outside of the park. The comments are drawn regarding safety implications of the DEIS recommendations.

Clarification**COMMENT:**

Air quality data was only collected at the West Entrance and along the West Yellowstone, MT to Old Faithful corridor and at the West Entrance air samples were collected for only 4 days. It has been suggested that radio transmissions from the West entrance altered the air quality monitors and the readings at that entrance. No attempt was made to determine what component of air pollution was due to wood stoves and fire places versus snow machines and none of the data collection practices were reviewed by peer groups in that field. Even with these errors, the air quality at the West Entrance was never shown to be worse than the federal air quality standards and only exceeded Montana's standards during the morning hours (8-10 am) when the YNP shows that about one-third of the daily traffic volume entered Yellowstone National Park.

REMARKS:

The Montana Department of Environmental Quality (DEQ) operates a monitoring station for carbon monoxide near the west entrance and a monitoring station for particulates in the Town of West Yellowstone. In 1993, the maximum 8-hour reading at the Montana DEQ monitoring station was 8.4 ppm, over the federal 8-hour reading limit of 9 ppm. These readings are the 8-hour federal and Montana ambient air quality standard of 9 ppm, which is based on the average 8-hour reading.

COMMENT:

The section on public health includes the sentence, "Violation of national standards did not appear to occur under these conditions because the siting criteria used to determine compliance with National Ambient Air Quality Standards (NAAQS) were written to deal mainly with interstates and other roads where people do not congregate on the road itself (Snook-Fessell 1996)". That sentence should be explained because it seems to suggest that the author pre-supposed that violation of standards had occurred and that the inability to document a violation somehow implicated the standards, rather than suggesting the lack of a violation.

REMARKS:

This sentence will be revised.

COMMENT:

Snowmobile emissions is and ought to be an important issue in this DEIS. Given the information, or lack thereof, in the Snowmobile Emissions Exposure, the DEIS should document the degree to which the present condition for air quality constitutes a problem.

REMARKS:

Snowmobile emissions and other winter exposure were acknowledged as important issues in the DEIS, and additional air quality studies will be conducted for the park.

COMMENTS:

It has been reported in the news that the Park Service Officials testing of snowmobile emissions was conducted to make it look like the amount of emissions emitted by snowmobiles was greater than it actually was.

PUBLIC HEALTH

Page 2, Table 1, item 5: The table lists emission factors "Polaris 98 Rich" but does not explain this test's importance to managers. NPS should provide this explanation for their management. The "Rich" test shows that snowmobiles need to be properly set-up and jetted for the elevation and climate where they will be operated. The "Rich" test was conducted to simulate emissions and performance of a snowmobile that is jetted for a lower elevation, like Minnesota, but used in Yellowstone without re-jetting-a situation that does occur regularly in Yellowstone.

SUMMARY RESPONSE:

The NPS did not conduct emission testing of snowmobiles. The analysis in the DEIS relied on the most recent engineering and scientific data in the literature.

COMMENT:

Page 93, first sentence after Table 8: The sentence may refer only to the setting of national standards, but does not reflect the method used in Montana. The Montana standard was based on an epidemiological evaluation conducted by the State during 1979-1980.

RESPONSE:

The sentence will be clarified.

COMMENT:

"Page 3, second paragraph, second sentence, "...snowmobile emissions increase with an increase in speed..." This statement is misleading because the highest production of emissions is at idle. White (1998) showed that the hotter the engine is, the lower the emissions--emissions are a factor of engine speed and torque, not snowmobile speed, as indicated in the NPS report."

RESPONSE:

Engine speed and other parameters affect emissions production in different ways. For example, carbon monoxide emissions generally are proportional to higher rates when the engine is cold, while nitrogen oxide emissions are produced at higher rates when an engine is hot. The sentence will be clarified.

General (Public Health - Snowmobile Emissions Exposure)**COMMENT:**

The issue of human health identified in the scoping is missing from this Desired Condition. Studies have shown aerobic exercise such as nordic skiing are highly beneficial to human health. Cardio-vascular disease is the leading cause of premature death in America, according to the CDC. Desired conditions should include statement on the health benefits of human powered winter use activities.

RESPONSE:

The general issue of exercise as beneficial to general health is not a focus of the DEIS.

Analysis (Public Health - Snowmobile Emissions Exposure)**COMMENT:**

Second, air pollution sensors measure differently between summer and winter, temperature and humidity have a tremendous effect to the sensors.

RESPONSE:

In general, air monitoring precisely provides the use of constant temperature housings for the instrumentation to eliminate temperature and humidity fluctuations from air quality sampling readings.

COMMENT:

Third, a single gallon of gasoline creates "x" amount of pollution regardless whether it is burned in an automobile or snowmobile, so how can a snowmobile produce 50 times greater pollution than a car?

PUBLIC HEALTH

RESPONSE:

Emission production is not a direct function of gasoline consumption. Gasoline is burned much more efficiently in automobile engines than in two-stroke snowmobile engines. In addition, automobiles are designed with emission controls, while snowmobile engines are not controlled.

COMMENT:

Have we factored the cost of their future health problems into the park entrance fee for snowmobilers?

RESPONSE:

No.

COMMENT:

However, they did not directly address the issue of limiting the numbers of snowmobilers entering the areas.

RESPONSE:

Determining recreation carrying capacity is a feature of all alternatives, as discussed on page 25 of the DEIS. Such determinations are complex tasks that can take a great deal of time and public involvement. In order to mitigate impacts of vehicle numbers in the interior, several alternatives will incorporate interim use limitations as choices for the decision maker.

COMMENT:

The EIS provides no data comparing automobile emissions with that of snowmobiles.

RESPONSE:

Gasoline is burned much more efficiently in automobile engines than in two-stroke snowmobile engines. In addition, automobiles are designed with emission controls, while snowmobile engines are not controlled.

COMMENT: I don't think that at this time enough research has been done to set standards, whether it be on decibel or pollution levels on two-stroke engines or the possibility of four-stroke engines on over-the-snow vehicles, primarily the snowmobiles.

RESPONSE:

The U.S. EPA has been investigating emissions from snowmobiles, but research on emissions from these recreational vehicles is not very extensive in data.

COMMENT:

NPS should check on pollution level of cars.

RESPONSE:

Emissions from automobiles are much less characterized than those from snowmobiles.

COMMENT:

Implementation of reduced emissions is too slow, speed up the process.

RESPONSE:

Air quality problems are mitigated in part by reducing the numbers of over-snow vehicles. This would be an interim measure, pending a long term visitor carrying capacity study. Air quality impacts are not reduced sufficiently by cleaner fuels and lubricants since the number of over-snow vehicles are not limited. In order to mitigate impacts of vehicle numbers in the interior, several alternatives will incorporate interim use limitations as choices for the decision maker.

PUBLIC HEALTH

COMMENTS:

It is a surprise that the phasing and implementation of sound and emission standards should take 10 years.

Why wait until 2008 to enforce stricter laws on emissions?

I applaud the fact that steps will be taken to improve (I assume reduce) the emission and noise/sound standards, however, I believe 2008 or 2009-10 or 11 years is too long of a time for this change to take place.

RESPONSE:

Experiences in the motor vehicle industry has shown that industry needs a number of years to phase in new, more stringent technologies.

COMMENT:

"Page 2, Table 1, Snowmobile emission factors: It is inappropriate to, average all these emission factors due to the differences in test procedures and availability of products. For example, line item 8 lists SWRI 1998 Polaris emissions using aliphatic gasoline. This fuel is a specialty chemical in the United States costing about \$3.50 to \$4.00 per gallon (before taxes). The fuel type was added by SWRI in cooperation with some European countries. Aliphatic gasoline has no oxygenates, olefins, and virtually no sulfur or aromatics. Its purpose is to reduce carcinogenic exposures of operators (such as in the German forest products industry). The fuel is not suited to use in these two-stroke engines, and was found to increase ALL emissions but carcinogenic compounds. It would never be used in sleds in this country, and as a result of this testing, will not be used in Sweden or Germany either." See Montana DEQ Comments.

RESPONSE:

The DEQ is aware of the limited test data and test conditions, including fuel type. No decisions have been made on the basis of one set of conditions.

COMMENT:

"Page 8, last paragraph, "...4-hour exposure...." The paragraph uses the exposure samples in an incorrect manner. It is inappropriate to compare, a 4-hour exposure with an 8-hour standard. To properly compare the sample with the standard, the assumption must be made that this was the exposure for the entire shift, and divide the sample amount by the total hours of the shift. Comparisons in the revised draft final from Kado et al. should be used. The samples were taken during the times of highest exposure. They show a need for a follow-up study, and a possible need to move employees between jobs and exposure levels during a shift. They do not show that a standard has been exceeded or approached, which is what these statements imply." See Montana DEQ Comments.

RESPONSE:

All data, including those reported by Kado, et al., will be reviewed for the PRM.

COMMENT:

The emissions issue of snowmobiles is vastly overstated. What about all the pollutants from diesel trucks?

RESPONSE:

Reported measurements taken at the trail entrance or other locations are not intended to be a true measure of air quality levels at all parts of the park. The measurement is done to help determine if the park is the source of air quality problems in the surrounding area.

COMMENT:

The emission issue is very misleading, if not downright untrue. Reading (sic) are taken at the gate and accepted as being the norm throughout the park. How about a reading at the gate at (?) O'clock in the evening. The reading then would be zero, as it would be throughout most of a 24 hour period. The emissions in Los Angeles do not go to zero in the evening. How about taking a reading several hundred yards from the trail at the gate? The Reading s (sic) there would be much lower.

PUBLIC HEALTH

RESPONSE:

Wyoming Department of Environmental Quality (DEQ) personnel have been involved since before the EIS was undertaken in planning and implementation of air studies in YNP. The Wyoming DEQ was not actively involved, and no input was received from them prior to publishing the DEIS.

COMMENT:

I have contacted Dennis Hemmer, Wyoming DEQ Director, and this state would be willing to participate in an air quality study in the area. It would be necessary to obtain any funding from the Federal Government for this study. The new air study could be used to amend the Winter Use EIS at some future date.

RESPONSE:

The Wyoming Department of Environmental Quality is the regulatory authority for some aspects of the Clean Air Act, delegated to it by U.S. EPA. The NPS has explicit authority over resources and their management on public lands in their jurisdiction. This includes air and air quality related values. The NPS has the assertive responsibility under the Clean Air Act to protect air quality (and related values) in Class I airsheds. It has the authority to undertake management actions intended to meet that need, as an entirely separate issue from national ambient air quality standards and state regulatory processes. New air dispersion modeling has been undertaken since the publication of the DEIS, and its findings will be incorporated into the FEIS.

COMMENT:

First, EPA concludes that Alternatives A through F do not assure compliance with National Ambient Air Quality Standards (NAAQS) with respect to carbon monoxide (CO). The standard for CO is based on protection of human health. Despite data indicating existing significant impacts from CO in the Parks, this DEIS defers the decision on reducing human exposure to high CO levels in the Parks through "adaptive management" and through OHV emission controls that would not take effect until at least 2008. The NPS has available management tools that could address these impacts through this actions including limiting numbers and density of OHVs in the Parks, and it is not clear why these or other measures are not being proposed in the preferred alternative.

RESPONSE:

The preferred alternative is not a decision. It is an indication of the direction that the NPS was leaning at the time of the DEIS and prior to public comment and final analysis. In fact, the preferred alternative is changing in the FEIS. Other alternatives in the EIS contain features that address issues within different time frames, as in the new preferred Alternative G.

Assumptions in Analysis (Public Health - Snowmobile Emissions Exposure)

COMMENT:

Air quality is identified as a problem needing attention, yet overall air quality is generally good and air quality standards are occasionally exceeded only on high use snowmobile days (Pg. 94).

RESPONSE:

Exceedances of air quality standards are not acceptable in a Class I park.

COMMENT:

USGS 99-4148 document, the "Conclusions" under paragraph I, last two sentences, lines 19 thru 27, "These chemical data establish important baselines...related to gasoline combustion." This clearly demonstrates that snowmobiles have minimal pollution impacts.

RESPONSE:

The reported conclusion does not demonstrate that snowmobiles have minimal impacts.

COMMENTS:

In 1998 the monitor at the gate had the highest carbon monoxide spike in the entire US for the entire year. But before you take aim on snowmobiles for this, note that that spike occurred in October, not a snowmobile in the entire valley was running. That area is already prone to emission concentrations

PUBLIC HEALTH

SUMMARY RESPONSE:

Comment does not provide data, and the NPS is unaware of any data indicating that a carbon monoxide spike was the highest carbon monoxide ambient concentration measured in the entire US in 1998.

COMMENT:

The staging area for snowmobiles would move from West Yellowstone to Madison and Old Faithful. Isn't this just moving the pollution problem from the entrance to the interior of the park?

RESPONSE:

No alternative in the DEIS recommends moving staging areas. Public access would be available to Madison and Old Faithful from West Yellowstone primarily by mass transit vehicle. People would not be trailering snowmobiles to those destinations.

COMMENT:

For air quality concerns, an unstated assumption regarding the West Entrance to Yellowstone National Park is that the current entrance kiosk and method of admittance to the Park will remain unchanged. This assumption needs to be challenged because the location, configuration, and operation of the station contribute significantly to poor air quality at the site. Research in early 1999 shows that emissions levels are highest at the west entrance. Emissions levels are reduced to about 25 percent of this high at Madison Junction and Old Faithful (where more snowmobiles were operating), and emissions are even lower a kilometer west of the entrance, and lowest at a West Yellowstone residential site about two kilometers from the west entrance (Kado et al. 1999).

RESPONSE:

The NPS is aware of the data cited in the comment and is considering possible changes in kiosk operations.

Clarification (Public Health - Snowmobile Emissions Exposure)

COMMENT:

First, photos that show a snowmobile idling in the winter shows the "smoke" that it creates. Please make note that the majority is condensation seen only when it is cold.

RESPONSE:

Yes, cold engines generate visible water vapor, as well as air pollutants.

COMMENT:

What is all this information in the EIS on emissions? I thought EPA regulated emissions.

RESPONSE:

EPA has regulated emissions from highway motor vehicle since the 1970s. However, EPA did not regulate emissions from nonroad engines until the mid-1990s. Standards exist for new engines used in construction, farm, lawn and garden equipment, marine vessels, and locomotives. However, there are no standards for snowmobiles to date. EPA anticipates promulgating standards for snowmobiles in late 2000.

COMMENT:

I wonder why two government agencies (NPS and EPA) have not worked out a good working plan for emission standards.

RESPONSE:

EPA has primary authority and is the lead authority on setting emission standards for mobile source engines.

PUBLIC HEALTH

COMMENT:

Question studies on emissions. Want to see data and who performed tests.

RESPONSE:

Public emission test data can be found in several of the DEIS references, including J. White and J. Carroll. Data related to exposure to emissions from snowmobiles can be found in DEIS references such as L. Snook, Bishop and Steadman, and National Park Service, 1996b.

COMMENT: Restrict motorhomes, motorcycles, buses, pickup trucks as they must cause as much pollution as snowmobiles.

RESPONSE:

Currently, snowmobiles are the dominant population of mobile sources in the wintertime in the park. Although other vehicle types produce emissions, they are not the subjects of study in this analysis, nor have they specifically been identified as of concern during other seasons.

COMMENT:

Then why allow them [snowmobiles] in the park at all, or is the goal just to lesson (sic) the pollution by cutting down the numbers? If so, why from just West Yellowstone?

RESPONSE:

Snowmobiles have been operating in the park for several decades. One purpose of the Winter Use Plan DEIS is to address snowmobile and air quality issues.

COMMENT:

Is the pollution (sic) creating area health threat to either the humans or the wildlife?

RESPONSE:

The DEIS outlines published studies on health issues in the park in the winter.

COMMENT:

Why is there so little "understanding" of the air quality and resource impacts of snowmobile emissions of the typical duty cycle of a snowmobile? We believe that an analysis of the emission load of summer use and pre-1970 automobiles offers a scientific perspective for today's winter use.

RESPONSE:

There are few snowmobile engine emissions data, and comparisons to pre-1970 automobiles and current snowmobiles are not viable. Pre-1970 autos were 4-stroke engines operating on leaded gasoline, while snowmobile engines are 2-stroke engines operating on unleaded gasoline.

COMMENT:

I assume that the reference to wood smoke in the staging area refers to that created by fireplaces and wood burning stoves in Jackson. This should be more clearly stated.

RESPONSE:

For purposes of this Winter Use Plan, woodstove and fireplace emissions are generally of interest in the town of West Yellowstone, not Jackson.

COMMENT:

What is the probability that standards can be met by the timeframe you have designated? And if standards cannot be met, will the implementation date be pushed out farther or will the Park implement immediate checkpoints and prohibit snowmobiles which are out of compliance from entering the park?

RESPONSE:

The NPS is not in a position to estimate probabilities of snowmobile manufacturers in meeting standards in the proposed timeframe.

PUBLIC HEALTH	
Clarification (Public Health – Automobile and Bus Emissions Exposure)	
COMMENT:	You can't tell me that tour busses run cleaner than snowmobiles.
RESPONSE:	Transportation from now on, but engines are regulated by EPA, but snowmobile engines are not.
SUMMARY COMMENT:	The NPS needs to address pollution from exhaust associated with snowplows, automobiles and busses. These sources will have significant public health impacts.
SUMMARY RESPONSE:	Additional air quality analyses related to alternatives involving autos, buses and trucks are being conducted for the FEIS.
COMMENT:	Media attention focuses around snowmobiles and the pollutants they supposedly put into the air, but what about the thousands and thousands of stinky tour busses and automobiles that drive bumper to bumper around the parks in the summer months?
RESPONSE:	The Winter Use Plan DEIS focuses on winter visitation only. Although other vehicle types produce emissions, they are not the subjects of study in this analysis, nor have they specifically been identified as of concern during other seasons.
COMMENT:	Busses currently operating in the Park frequently abuse national emissions and sound standards.
RESPONSE:	Currently, buses do not operate in most of the park in the winter, and the Winter Use Plan DEIS focuses on winter visitation only.
SUMMARY COMMENT:	Air pollution levels by buses parked and idling at Old Faithful would be higher than the pollution created by snowmobiles.
SUMMARY RESPONSE:	All tour bus operators receive written instructions when they enter the park that buses are not permitted to idle unless they are loading, unloading, or warming up.
Clarification (Public Health – Snowcoach Emissions Exposure)	
COMMENTS:	Multipassenger snowcoaches, which certainly produce much less pollution per passenger than do snowmobiles.
	What would the daily air pollution in Yellowstone from this many coaches be?
SUMMARY RESPONSE:	Additional air quality analyses that relate to alternatives involving snowcoaches are being conducted for the FEIS.
COMMENT:	The existing snow coach fleets operated by commercial vendors should be inspected for emissions and required to meet certain standards.

PUBLIC HEALTH

RESPONSE:

The DEIS is not and will not be required to conduct a snowcoach emission inspection program at the park entrance. However, snowcoaches operated by licensed professionals will meet EPA emission standards for the class of vehicle engine that powers the snowcoach.

Methods (Public Health – Snowcoach Emissions Exposure)**SUMMARY COMMENT:**

How can 2000 snowmobiles leave so many tons of emissions? The vehicle emissions violations at the West Entrance station cannot be completely accurate. The monitoring system used is located under the eave of the building, and idling snowmobiles are parked 5 feet away. This definitely does not fit the mode of scientific based research.

SUMMARY RESPONSE:

Most recent engineering and scientific data were used in context of time and resources available. Additional technical analyses (e.g., air dispersion modeling) are to be included in the FEIS.

COMMENTS:

My feelings are that the studies were conducted with variables, which are not standard conditions.

You claim that as many as 2,000 snowmobiles enter the park in one day and emit as much as 100 tons of emissions into the air. Simple arithmetic will show this to be way off the mark. If 2,000 snowmobiles use about 7 gallons of gas and oil (on average) in one day, this would (at approx. 7.5 pounds per gallons) weigh 15,000 pounds or 7.5 tons. When you consider that at least 80% of the gas is burned, that leaves only 1.5 tons of emissions at worst case. And that is only on peak days!

SUMMARY RESPONSE:

The weight of combustion gases created from combusting fossil fuels is not equal to the weight of the fuel. Annual emissions are calculated using emission factors (grams/mile for snowmobiles in motion and grams/hour for idling snowmobiles) that are applied to estimated miles traveled and estimated idling times during the winter season.

General (Public Health and Snowmobile Emissions Exposure)**SUMMARY COMMENT:**

The typical snowmobile uses a two-stroke engine that produces high emissions of carbon monoxide (CO), unburned hydrocarbons (UHC), particulate material and a variety of gases classified as "air toxics" such as formaldehyde, and VOCs such as benzene. Snowmobiles don't use any pollution control equipment. The emissions are significantly higher than present-day automobiles and can concentrate in areas having cold and stable air.

SUMMARY RESPONSE:

The DEIS acknowledges that there are relatively high emissions associated with two-stroke engines compared to four-stroke engines.

COMMENTS:

Exposure to air pollutants, such as those listed above, is associated with numerous effects on human health. Those effects range from impairment of visual perception, manual dexterity, learning ability, and performance of complex tasks to headaches, fatigue, respiratory failure, and even death. Health concerns that are most commonly raised within the Park are related to smoke and vehicle emissions. Over 1200 letters of complaint were received by YNP in 1993 and 1994 relating to issues of employee and visitor health and excessive snowmobile pollution.

PUBLIC HEALTH

Snowmobiles damage visitor and employee health.

SUMMARY RESPONSE:

The DEIS cites over 1,200 visitor complaint letters received in 1993-94 relating to snowmobile emissions and results of preliminary carbon monoxide sampling conducted in 1996 that raised health concerns.

COMMENT:

Bombardier snowcoaches with emissions that are similar to those of light trucks manufactured prior to 1970 (very high HC and 1,000 gm/mile CO).

RESPONSE:

Older snowcoaches are likely to have emissions that are very much higher than modern day light-duty vehicle engines.

COMMENT:

"Page 9, paragraph 3, first sentence "dangerously high." What standard is NPS using to determine that these levels are "dangerously high?" Please remove the word dangerously or cite the corresponding standard used. We agree that employees and visitor exposure needs to be minimized, however, more study is needed before these levels can be categorized as dangerous. Further, the paragraph implies that removal of high levels of snowmobile emissions would resolve all the problems, which is false. The problem really is a high amount of pollution trapped in an area with poor dispersion characteristics. This usually occurs with automobiles and trucks in congested areas. NPS can reduce congestion in certain areas to reduce exposure, and or relocate congestion of winter traffic to areas with better air flow and emission dispersion characteristics."

RESPONSE:

Modifiers such as "dangerously high" will be used only when supported by empirical data. Most recent engineering and scientific data were used in context of time and resources available for the DEIS. Additional technical analyses (e.g., air dispersion modeling) are to be included in the FEIS.

COMMENT:

There is every indication that visitation levels will increase. Since this is indicated in the discussion of the impacts of some of the other topics, it should be indicated here too.

RESPONSE:

Measures directed at air quality and visitation increases generally apply to the issue of public health.

COMMENTS:

Page 202, paragraph 1, first sentence: The word "snowmobile" should be changed to over-snow vehicle" emissions because all vehicle emissions will be effected. DEQ estimates that CO vehicle emissions would be reduced by about 15 percent of those in Alternative A. The effect of this reduction would be seen in DEQ's evaluation of the estimated worse-case 1 hour CO levels for the West Entrance. For this evaluation, DEQ used information on Alternative B using data from paragraph 2 and pages 217 and 218. The CO level would be about 16 to 22 percent of the CO level in Alternative A for the West Entrance of the Park (Table 1, Cain et al. 1999). It is not the lowest level derived from modeling the alternatives-that would result from either Alternative F, closing the roads, or an alternative based on the exclusive use of electric snowmobiles mentioned on page 208 (alternative fuels), either of which would produce negligible emissions at the West Entrance.

Page 225, first paragraph: Alternative C is better for air quality than Alternative B. It is not the same as indicated in this paragraph. DEQ estimates that Alternative C would reduce CO emissions from vehicles by about 12 percent. DEQ's analysis and professional review of the 1-hour peak CO level for a worse case scenario at the West Entrance under Alternative C is about 16 to 20 percent of the CO levels estimated in Alternative A.

SUMMARY RESPONSE:

Additional air dispersion modeling for carbon monoxide for all alternatives will be included in the FEIS.

PUBLIC HEALTH	
Negative Effect (Snowmobiles on Public Health)	
SUMMARY COMMENT: The preferred alternative should prohibit recreational snowmobile activity because such activity causes damage to [...], public safety and health.	
SUMMARY RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.	
Positive Effect (Banning Snowmobiles on Public Health)	
COMMENT: In doing so, you would not only protect the wildlife and our truly beautiful and spectacular natural resources but also improve the health of our people.	
RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.	
No Effect (Snowmobiles on Public Health)	
COMMENT: Snowmobiles do not cause damage to park resources, [...], public safety and health, and [...].	
RESPONSE: Impacts of winter recreation and related actions are disclosed in the DEIS. In some instances, the modeling of air quality will provide greater quantification of some impacts, by alternative, in the FEIS.	

SAFETY

SUMMARY COMMENT:

Some commenters were concerned about hazards associated with snowmobile operation including that groomed roads would foster higher snowmobile speeds; snowmobile speed, generally; dangers associated with young operators; that snowmobiles may cause avalanches; and that snowmobiles are a hazard to other visitors such as snowshoers and cross-country skiers.

SUMMARY RESPONSE:

These and many other factors are discussed in the "Public Safety" sections in both the "Affected Environment" and "Environmental Consequences" sections of the EIS. Several of the alternatives, and especially Alternative G of the DEIS and as revised in the FEIS (which will have snow coaches as the only oversnow vehicle in use for the visiting public) addresses many of these concerns.

COMMENT:

The concern is expressed that a shift of snowmobile use from West Yellowstone to the South Entrance would result in a safety problem where tow vehicles and trailers would be parked along the roadway because of a lack of parking space.

RESPONSE:

Adequate parking would be provided as needed and appropriate or use limits would be implemented if carrying capacity studies indicated such a need.

COMMENT:

The concern about the need to plan for motorists who get trapped at Old Faithful by winter storms was expressed.

RESPONSE:

There are numerous options available now, or that would be implemented, to meet such a situation.

SUMMARY COMMENT:

Concerns were expressed related to plowing the road and increased use by wildlife and trapping of wildlife on the roadway, and the hazards of this to travelers.

SUMMARY RESPONSE:

There is no evidence from roadways that are currently plowed (for example from Mammoth to Cooke City) that there would be increased use on plowed roads by wildlife or that plowing is associated with increased wildlife-vehicle accidents. Also, the snow berm would be laid back at appropriate intervals to allow adequate egress by wildlife from the roadway.

COMMENT:

The concern is expressed that a plowed road between West Yellowstone and Old Faithful would be dangerous due to winter conditions.

RESPONSE:

There is no reason to believe that this section of road would be any more dangerous than other similar roadways that are plowed in the winter throughout the mountainous west. And, there are numerous measures that would be implemented to address specific problems to appropriately minimize the hazards. Also, under alternative B, shuttle busses would be available and they would have drivers trained and experienced in winter driving conditions.

COMMENT:

The concern was expressed that with increases in non-motorized winter use there would be more people who felt alone and wouldn't be caught breaking regulations dealing with the thermal features and could endanger themselves.

RESPONSE:

As is the present condition, many people who desire to recreate in groups, do so. Nonmotorized winter use does not equate to aloneness, unless it is desired, nor does it equate to lawlessness.

SAFETY**SUMMARY COMMENT:**

Commenters were concerned that the safety issues of nighttime closures, commingling of snowmobiles and cars on the Continental Divide Snowmobile Trail, increased enforcement of speed limits, and visitor experience were not addressed.

SUMMARY RESPONSE:

All of these topics are addressed in several parts of the DEIS: in the "Alternatives" section, in the "Affected Environment" section, and in the "Environmental Consequences" section.

SUMMARY COMMENT:

Concern was expressed about the safety of the Continental Divide Snowmobile Trail (CDST).

SUMMARY RESPONSE:

Safety of the CDST has been addressed in several alternatives: alternative B moves the segment of the CDST from Moran to Flagg Ranch to a new pathway, alternative C widens the road shoulder between Colter Bay and Flagg Ranch to better accommodate the CDST, alternative C moves the CDST to an unplowed road from Colter Bay to Flagg, and to a widened highway shoulder from Colter to Moran, alternative D would be the same as in alternative C, alternative E transports CDST users in a shuttle from the east boundary to Flagg Ranch, and alternative G eliminates the CDST in Grand Teton National Park.

COMMENT:

The commenter is concerned that the DEIS does not address public safety outside the parks in the GYA.

RESPONSE:

Public safety outside the parks in the GYA is not specifically addressed in either the DEIS or FEIS. However, this issue is included by inference in the section "Direct, Indirect and Cumulative Effects on Adjacent Lands" subsection of the "Environmental Consequences" section.

COMMENT:

The concern is expressed that the safety issues of the increased kinds of use as well as the increased overall use resulting from adding plowed roads to snowmobile trails are not addressed.

RESPONSE:

The NPS believes that these issues have been addressed in the description of alternative B. For example, nighttime oversnow travel is prohibited from about 11 P.M. to 5 A.M.; an "aggressive information and enforcement program to ensure that oversnow speed limits and rules are followed, and to encourage appropriate winter recreation behavior and etiquette" would be implemented; and sand would be used for traction on all plowed winter roads (this latter is common to all alternatives). Other detailed measures are not normally included in a programmatic EIS such as this, but appropriate measures would be implemented as needed.

SUMMARY COMMENT:

Concern is expressed about how emergencies would be handled where the larger groups of people carried by busses or snowcoaches were involved.

SUMMARY RESPONSE:

Numerous appropriate options would be put in place for such contingencies. But, discussing that level of detail is not necessary in this programmatic EIS and does not require environmental analysis for implementation.

COMMENT:

The commenter indicates that there is no discussion of safety as it relates to the east entrance of Yellowstone National Park. Also, they indicate that there is no mention of snowmobile avalanche-related incidents, accidents or fatalities on this segment, or for that matter in all of Yellowstone National Park.

SAFETY

RESPONSE:

In the "Avalanche Hazards" sub-subsection of the "Public Safety" subsection of the Affected Environment" section Sylvan Pass, which is near the east entrance, is listed as one of three locations that avalanche control is practiced. In this section, there is also the indication that there have been three deaths caused by an avalanche within the past decade and that they were all backcountry skiers. Thus, no fatalities have occurred within the past decade in the east entrance (i.e., the east entrance is not in the backcountry) nor, were there any avalanche caused fatalities to snowmobilers.

COMMENT:

The commenter was surprised that the impact of noise pollution and backcountry winter use on avalanche dangers was not discussed.

RESPONSE:

To our knowledge, noise that occurs in the parks does not contribute to increased avalanche danger. There is an assumed potential for an increase in avalanche danger as backcountry winter use increases. The association between avalanche danger and back country winter use is discussed in the "Avalanche Hazards" sub-subsection of the "Public Safety" subsection of the "Affected Environment" section of the DEIS.

COMMENT:

The commenter suggests that the data need to be expressed in terms of the relative snowmobile traffic during day and night. They recognize that most traffic would be during the day. They also comment that the data on incidents with bison at night supports the need to restrict motorized traffic during the night.

RESPONSE:

NPS studies verify that much less than 10% of the total traffic occurs at night between 5 P.M. and 8 A.M. However, 10% of the accidents occur between 5 P.M. and 11 P.M. The NPS agrees that there is a good argument for restricting motorized travel during nighttime hours.

COMMENT:

The commenter finds the discussion regarding the percentage of nighttime accidents that involve bison on page 100 in the "Time" subsection of the DEIS confusing.

RESPONSE:

This subsection has been revised and clarified.

COMMENT:

The comment relates to avalanche control practiced at Dun Raven Pass. The commenter asks, if the road is closed to all travel, why avalanche control? Or is avalanche control practiced only when the road is being plowed in the spring?

RESPONSE:

Avalanche control is done only during the springtime opening of the road. The road is not closed to all travel in the winter. It is open to cross country skiing and snowshoeing.

SOCIOECONOMICS**COMMENTS:**

My main comment is that while most of the changes are directed at snowmobilers, the economic impact analysis is based on expenditures by all winter visitors of which only 61 percent are snowmobilers. Since snowmobilers tend to spend more than other winter visitors this would tend to underestimate the total economic impact estimates. It would seem more appropriate to consider changes in snowmobiler expenditures relative to other types of visitors expenditures. Specific comments are as follows:

Although the 17 counties considered in the GYA are linked geographically, they are not necessarily linked economically. It would be more appropriate to consider the functional economic units within the region (perhaps based upon commuting zones) and consider the economic impacts on each. The statement that total impact of winter visitors is 0.5% of the total for the GYA is not terribly relevant. [Vol. I, page 89]

Although only 4 to 5% of annual recreational visitation to YNP occurs during the winter months [Vol. I, page 89], it does not mean that winter visitation is not important to surrounding communities. Since winter visitation occurs at a low point for tourism it may be very important to tourist businesses in these communities to help them survive between peak summer seasons.

The EIS indicates that the poverty rate in the GYA is consistent with the 3-state region. However, in places like Jackson where the cost of housing is 176 percent of the state average, the overall cost-of-living is 132 percent of the state average, and the average earnings per job is below the state average, there is probably a lot of "defacto" poverty.

The economic impact estimates are based on the averages of all respondents. Page 90 indicates that 61.0 percent of the respondents were snowmobilers, 9.8 percent were riding snowcoaches, and 24.6 percent were cross-country skiing. But 90.1 percent of the respondents at the west entrance were snowmobile. Since alternative B would almost exclusively affect snowmobilers, the resulting economic impact should be based on the expenditures for snowmobilers and not the average for all respondents. Also, the change in number of visits should consider the change in snowmobiling visits relative to the changes in other types of visits. Previous research has indicated that snowmobilers spend more than other winter visitors [Park County, WY Winter Visitor Assessment Taylor, 1999], so estimating the impact based on all respondents would tend to underestimate the impacts. This comment would also apply to the other alternatives since most of the changes are directed at snowmobilers, not all winter users.

RESPONSE:

The economic impact analysis has been revised with expenditures now based on the actual group indicating they would decrease (or increase) their number of trips in response to policy changes. As the comment correctly notes, most of the trip decreases are for snowmobilers, who tend to have higher trip expenditures. The analysis has also been revised from a 17-county impact region to a five county region to provide a quantitative measure of the change in the area most impacted. The DEIS acknowledges that winter visitation is important to surrounding communities and notes that, for example alternative B, (at p. 193) "would have a major negative impact on the West Yellowstone winter economy." The comment on "defacto" poverty provides new information that will be included in the FEIS Chapter 3.

COMMENT:

In short, even if a prohibition on snowmobiling, snowcoach operation, and trail grooming resulted in the economic collapse of a business or an entire gateway community --which it would not -- the NPS is not responsible and has no obligation to continue to permit an otherwise illegal activity which has and will continue to destroy park features and values in order to avert such as impact.

RESPONSE:

This comment is correct. Nonetheless policy makers have an obligation to identify impacts and avoid them if possible.

SOCIOECONOMICS**COMMENT:**

Almost 92% of our income comes from the 3% Resort Tax (the Town of West Yellowstone)

RESPONSE:

This fact will be included in the FEIS.

COMMENT:

The analysis also does not adequately differentiate winter from summer recreation expenditures, nor does it account for recreation expenditures due to other attractions, such as MSU and visitation to national forests.

RESPONSE:

The focus of the analysis is on changes to expenditures due to policy.

COMMENT:

The DEIS should articulate the levels of winter use and growth in the businesses that provide support services, especially in the gateway communities, which have occurred in response to federal policies that authorized and, even encouraged, winter use in the parks.

RESPONSE:

The DEIS provides some discussion of historical data for West Yellowstone.

COMMENTS:

Dr. David Taylor from the U of W quantifies these impacts. In his May, 1999 study, Economic Importance of the Winter Season to Park County, WY, Prof. Taylor found that tourism is an important part of the Park County economy and winter tourism was a growing part of tourism mix. YNP visitors spent \$5.1 million in Park County; 30% of PC businesses have direct sales to YNP visitors; these sales represent 80% to total; supporting 467 jobs; net econ value of winter rec for PC \$3.8 million; snowmobiling represented 72% of this total.

Winter visitors attracted to Montana for recreation vacations had an average daily group expenditure of \$146/day, compared with \$107 per day per group for summer visitors. With an average stay of 5.4 days, winter visitor group expenditures averaged \$788. Winter visitors in Montana for snowmobiling averaged \$188 per group per day and those here for downhill skiing/snowboarding averaged \$134 per group per day. The average length of stay for both of these groups was 6 days which resulted in average trip expenditures of \$1,128 for snowmobile groups and \$804 for skiers.

SUMMARY RESPONSE:

This new data will be included in Chapter 3 of the FEIS.

COMMENT:

Although winter use estimated expenditures represent only 0.5 percent of the total expenditures, the DEIS paints a picture of extreme reliance on winter tourism. The DEIS states that retail trade and services accounted for about 42% of the 17 counties combined earnings and that recreation and tourism are key to the economic vitality of the area.

RESPONSE:

Comment is correct.

COMMENT:

Page 84, last paragraph of section. It would be appropriate to add that some of the recreational opportunities found in the GYA, particularly in Montana, are provided for through state grants to groom trail primarily located on adjacent U.S. Forest Service administered lands.

RESPONSE:

This information will be incorporated.

SOCIOECONOMICS

COMMENT:

Employment and Income: Page 84 - 88. The descriptions for these two sections discuss the role of tourism. It is stated that the "regional economy are dependent on the quality of the resource base that supports them." While it is briefly referenced in the Regional Economy section, information should also be included on the need for access to public lands for recreation.

RESPONSE:

Access is discussed in the context of the policy changes at issue.

COMMENT:

Is his [Duffield's] report available? Did he do a separate survey from that of Borrie and Freimund?

RESPONSE:

The report is available from the NPS. It was a separate survey.

COMMENT:

Also regarding economies, what is the basis for the estimate on page 89 of \$60 million in expenditures in the GYE by nonresidents visiting the parks in winter?

RESPONSE:

This estimate was developed for the DEIS by the authors based on the reported expenditures and visitation and using IMPLAN software.

COMMENT:

The DEIS (page 89) mentions the report by Neher, Robinson and Duffield on the estimated economic effects of the winter 1995-96 government shutdown on economies adjacent to the park. Is it possible to get a copy of this report, or at least the section assessing impacts on communities adjacent to YNP and GTNP?

RESPONSE:

The report is available from the NPS.

COMMENT:

There is a discussion on page 92 about survey responses on the question of willingness to pay. I didn't see this question in the 1999 final report from Borrie and Freimund; was this included in a different survey? Is this data further broken down between respondents who live within the GYE, within Montana, Wyoming or Idaho but outside the GYE, and out-of-state visitors?

RESPONSE:

Data source is referenced in the EIS. Breakdowns available are those reported.

COMMENT:

Please get information from more than one source before this winter recreation which brings much needed revenue to the national parks is lost.

RESPONSE:

FEIS is being revised to incorporate alternative impact analysis provided by the cooperators.

COMMENT:

It is quite unlikely that winter tourists and recreationalists would abandon the region because of restrictions in YNP proper.

RESPONSE:

Findings reported in the DEIS are consistent with this comment. Nonetheless, there may be some changes.

SOCIOECONOMICS

COMMENT:

As an alternative to snowmobiling I think that cross-country skiing or horseback transportation should be developed to give a winter economic base to the area around the park.

RESPONSE:

Findings reported in the DEIS indicate that cross-country ski use would increase under some alternatives.

SUMMARY COMMENT:

The DEIS has not accurately or sufficiently considered the impact of this alternative on surrounding communities, visitor expectation and experience, wildlife, and the resource.

SUMMARY RESPONSE:

The DEIS considers all the impact areas mentioned.

COMMENT:

The prohibition of snowmobiling and snowcoach use would not seriously impact the revenue of these cities and, indeed, could be a blessing by forcing them to diversify. If the NPS is going to consider the economic impact of its proposed alternatives, then this must include an analysis of the economic costs of continuing to permit snowmobiles in the Parks, including the cost of pollution, the killing of bison outside the Park, and the cost to the Park's ecology from continued degradation.

RESPONSE:

It is possible that some alternatives considered can have a major impact on gateway communities. See other related responses. On the other hand, in the long-run there may be some diversification, which is one reason impacts are expected to be no larger than projected. The major economic issues identified in scoping (discussed in Chapter 1 at p. 12-15) related to employment effects are best evaluated through a regional economic methodology as applied in Chapter 4. While pollution, bison management, and ecological impacts are important issues, scoping did not identify the economic aspects of these issues as a major topic. To address these issues from an economic standpoint would require a different accounting framework - benefit-cost analysis - which has not been applied in the case at hand.

COMMENT:

The whole lifeblood of West Yellowstone would be compromised and I am somewhat curious why these effects [of Alt. B] were not considered in the overall study.

RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

These real costs to the human environment are ignored in the draft Winter Plan so the economic analysis in the Draft Plan is incomplete and terminally flawed.

RESPONSE:

The real costs referred to are the lost recreation benefits of those who would choose not to visit Yellowstone NP in winter under the various plan alternatives. These costs were not estimated for the DEIS but are reported in the FEIS. For example, under alternative Q it is estimated that total visitation will decline in initial years by 33.4% and there will be a \$2.7 million reduction in the aggregate nonmarket value of winter trips to the parks. However, this computation is limited to direct use benefits. As noted in the affected environment chapter, the national general public favors a plan eliminating snowmobile use by about a 2:1 ratio over current management. The indirect positive net benefits associated with this change might well outweigh the potential reduction in direct use benefits.

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COMMENT:

The 5 adjoining counties developed data to document the economic impact of winter use. In the Winter Use Plan Draft EIS, this economic impact is then compared to the total economic activity of 17 counties surrounding the Yellowstone/Grand Teton area. The net effect of this contradictory comparison is to dilute the economic impact resulting from actions taken by the NPS.

RESPONSE:

The FEIS is being revised to evaluate the 5 county impact.

COMMENTS:

What has been discussed as to the economic impact to the gateway communities that have supported the Park for so long?

The potential economic impacts on the Town of West Yellowstone certainly has not been adequately addressed.

SUMMARY RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENTS:

Is the financial impact of the area being considered? Denying West Yellowstone entry would greatly affect the community financially.

SUMMARY RESPONSE:

Financial impacts are not quantified in the DEIS. However, from the perspective of the entire year tax revenues, the impact on West Yellowstone of anticipated changes in winter use is minor.

COMMENT:

I don't believe some of the impacts of your suggested plan have taken into consideration the surrounding communities.

RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198. The FEIS is being revised to evaluate the 5-county impact.

COMMENT:

The surrounding states estimate that this loss will actually be over \$100 million in visitor spending and more than 1,000 jobs in the GYA.

RESPONSE:

FEIS is being revised to incorporate alternative impact analysis provided by the cooperators.

COMMENT:

This town of W. Yellowstone has been interdependent with Yellowstone Park since its inception. The Park could likely be hurting itself economically, as well as West Yellowstone with Plan B.

RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

Provide supporting data for 330 jobs/\$13.750 million loss/\$12.7 billion total economic output.

RESPONSE:

Data for the policy response is detailed in the DEIS and the Duffield et al. 2000 winter survey report. The impact data is based on U.S. Bureau of Economic Analysis regional economic data and software incorporating this data from Minnesota IMPLAN Group 1996. See methods discussion p. 160 DEIS.

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COMMENT:

The DEIS attempts to minimize the importance of public access to YNP from the east entrance and states, "only minor adverse impacts would occur to overall park access because the 4,100 winter season visitors using the east entrance represent only 3% of winter season visitation."

RESPONSE:

In the context of overall, particularly year round, park visitation, winter visitation through the East gate is minor.

COMMENT:

If you're a resident of northwest Wyoming or a lodge owner outside the east entrance, this elimination of access is not minor, it is very major, because they are essentially shut-out of reasonable YNP access since their only access becomes either the south entrance (352 miles around during the winter), the north entrance (348 miles around during the winter) or the west entrance (410 miles around during the winter). Additionally, YNP staff stationed at the east gate would also have to travel 348 miles to reach park headquarters in Mammoth.

RESPONSE:

This comment is correct that in the context of adjacent business or residents the impact is major.

COMMENT:

The economic impact of this closure would be devastating to the Cody area and northwest Wyoming. The loss of these 4,100 visitors equates to \$5.4 million per year in visitor spending (4,100 visitors x \$1,324/visitor (\$774 direct and \$550 indirect) - Taylor, University of Wyoming 1995). This is a severe impact to an area of Wyoming which depends upon the tourism industry, year-round, to exist. Furthermore, because of the large amount of wilderness on the National Forest surrounding Yellowstone, which is closed to motorized use, there is no opportunity to relocate this displaced use. Therefore, this economic loss is permanent.

RESPONSE:

Impact analysis provided by the State of Wyoming that incorporates this comment's assumptions is included in the FEIS.

COMMENT:

The Winter Use Plan Draft EIS does not adequately take into account the cultural or economic significance of the Lower Loop of the Yellowstone Grand Loop.

RESPONSE:

The DEIS evaluates the implications of changes in visitor access based on responses of the actual users of the Grand Loop, as well as all other users.

COMMENTS:

The other "Alternates" do not take into consideration the impact on the communities surrounding our park.

RESPONSE:

The FEIS is being revised to evaluate the 5-county impact. The FEIS is being revised to incorporate alternative impact analysis provided by the cooperators. The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

"A loss of the regional expenditures by these nonresidents would lead to an overall reduction of \$14,700,000 in total economic output and 357 jobs in the 3-state area." We strongly disagree with your summation that this is a "negligible negative impact."

RESPONSE:

As a percent of the three-state economy, this is negligible.

SOCIOECONOMICS**COMMENT:**

We dispute the draft's analysis of the regional economy on pages 480 and 481, under "Unavoidable Adverse Impacts." You state on page 480 that: "[n]one of these above impacts could be considered irreversible or long-term in the context of total economy...[I]t is the nature of business to start or to change course based on economic self-interest or survival." Tell that to the hundreds of businessmen and women who make their living by providing a snowmachine winter experience to park visitors. Whoever wrote this has no sensitivity to business concerns. As other alternatives are available that could avoid this adverse impact, your conclusion is absurd.

RESPONSE:

This statement will be revised.

COMMENT:

The Park Service's 17-county regional model clouds severe effects various decisions will have on the neighboring counties, gateway towns and businesses and residences. These are communities where NPS employees live and shop. This approach ignores the direct interrelationship between the communities and the services they provide to both winter and summer visitors in the park. Many of these are dependent on the winter park season for their economic viability.

RESPONSE:

The FEIS is being revised to evaluate the 5-county impact.

COMMENT:

The projected losses under the preferred alternative do not adequately take other economic opportunities into account, such as an increase in other types of visitors.

RESPONSE:

Projected losses are net losses after identifying increases among current winter visitors. Discussion of potential changes among first-time visitors is provided in the FEIS based on new data from a survey of summer park visitors.

COMMENT:

The document fails to describe the degree to which levels of winter use and growth in the industries that provide support services, especially in the gateway communities, have occurred in response to federal policies that authorized and, perhaps even encouraged, winter use in the National Parks.

RESPONSE:

The FEIS provides some discussion of historical data for West Yellowstone.

COMMENTS:

My fear is that surveys of businesses surrounding the park are again biased. None (sic) of these small businesses have the budget to properly study the impacts. They are all guesses. Then the counties sum up these guesses, and there doesn't seem to be anyone looking at the summation critically.

These county surveys emphasized the initial shock to the economy, they did not attempt to forecast the new equilibrium that would emerge years later.

RESPONSE:

The NPS is obligated to incorporate some data and alternative impact projections provided by cooperators. Decision makers can form their own judgments on the data.

SOCIOECONOMICS**COMMENTS:**

In the one theory, if winter use of YNP is curtailed, all the tourists will leave, decimating the local economies of surrounding communities. In the other, they just recreate in the adjacent forest, and presumably still patronize these communities as before. These are directly competing theories. Both scenarios can't be correct.

The complaints of surrounding communities regarding their economic welfare is likely unfounded. Most people who come to West Yellowstone in winter to snowmobile prefer the trails maintained by the USFS, where regulations are fewer and less restricting.

RESPONSE:

The DEIS provided impact analysis that nets out projected increases and decreases.

COMMENT:

Ask this question: if the snowmobile is so critical to the West Yellowstone economy, then what were all these people doing before the snowmobile situation got so out of control?

RESPONSE:

The concern is for the current set of businesses, but another perspective is the business environment is dynamic.

COMMENT:

In the table "Summary of Effects" was the statement that there would be a moderate benefit to snowmobile renters. We fail to see how eliminating the primary snowmobile access route into the park would benefit snowmobile renters.

RESPONSE:

The statement at issue is in Table 4 (following p. 39), under alternative B and will be removed in the FEIS.

COMMENT:

A full identification and discussion of existing socio-economic authorities is lacking from the DEIS. For instance, it refers to "the U.S. Water Resources Council's Principles and Standards for Planning water and Related Land Resources (US Department of Interior [sic], Water Resources Council 1984)". However, according to US Department of Interior officials, there is no such document.

RESPONSE:

Thank you for correcting this citation, which should read (a p. 159 DEIS): "Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies (U.S. Department of Interior, 1983). This reference has previously been used by the DEIS authors to guide benefit-cost type of analysis. The citation is not necessary in the context of the current document and will be deleted.

COMMENT:

The bulk of the DEIS's Assumptions and Methods section rests on studies that are not yet finalized. Moreover, no target date for their completion is indicated.

RESPONSE:

Most of the analysis relies on the winter survey report, which has been peer reviewed and was finalized in early May 2000.

COMMENT:

Moreover, the authors of the DEIS failed to utilize the information that is available. The Cooperating Counties provided NPS with analysis on the general economic effects for each individual county. The DEIS makes only a brief reference to one of these studies (Gallatin County, Montana) before casually dismissing the information as only "potentially relevant."

RESPONSE:

FEIS is being revised to incorporate alternative impact analysis provided by the cooperators.

SOCIOECONOMICS**COMMENT:**

This approach has proven to be controversial for a number of reasons, chief among them being the speculative nature of the response. The report makes no mention of this failing, choosing instead to only discuss its positive aspects.

RESPONSE:

The approach at issue in this comment is contingent valuation - an approach for measuring nonmarket benefits. As is now noted in the FEIS Affected Environment - Nonmarket Values section, this area of research can be controversial. However, most economists accept this method for estimating the value of direct recreation use. The more controversial issues are associated with estimating values where no direct on-site use is involved. The values reported in the FEIS are limited to measures of direct recreational use.

COMMENT:

Most obvious is the fact that, while only the surrounding counties were granted cooperating status, the Park Service's economic analysis of the preferred alternative dispersed impacts over a much larger geographic area and, in effect, minimized the impact on the very entities it had earlier identified as having the greatest interest in this process.

RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198. The FEIS is being revised to evaluate the 5 county impact.

COMMENT:

While much of the descriptive economic information was informative, we would recommend that the data be displayed down to the county level, as well as the aggregate 17 counties.

RESPONSE:

This level of detail is not necessary for characterizing either the affected environment or impacts.

COMMENT:

We recommend that this section's information be updated in the FEIS analysis with the findings of the Winter 1998-1999 Visitor Survey in YNP, GTNP and GYA: Analysis and Results prepared by John Duffield and Christopher Neher.

RESPONSE:

Most of the analysis relies on the winter survey report, which has been peer reviewed and was finalized in early May 2000.

COMMENT:

This emphasis on the economic impacts of winter use beyond the borders of the Parks is unnecessary and misplaced.

RESPONSE:

Economic impacts on local economies was a major issue identified in public comment.

COMMENT:

While the definition of impact or effect under NEPA includes reference to economics, this impact must be subservient to ecological impacts of the action.

RESPONSE:

Decision makers will have to weigh the different impact measures.

COMMENT:

Snowmobiling is not a problem [but creates] lots of revenue.

RESPONSE:

Snowmobile negative impacts were identified in public comment as an issue.

SOCIOECONOMICS**COMMENT:**

The economic impact of snowmobiling to local economies appears to have been overstated in many of the studies completed by cooperating counties. For example, Yellowstone Park visitation figures indicate that only 3 percent of winter visitors came through the East entrance. The actual number has been declining, and last winter was just under 3,000. A 1999 report titled *The Economic Importance of the Winter Season to Park County, WY* estimates the economic impacts of a prohibition on winter visitation, something which has not been proposed in any alternative. Interestingly, in the 1999 survey of park and national forest visitors, the use of Shoshone National Forest and other sites to the east were not even mentioned as locations for their recreation by park visitors who snowmobiled or skied in areas other than the park during their visit.

RESPONSE:

The NPS is obligated to incorporate some data and alternative impact projections provided by cooperators. Decision makers can form their own judgments on the data.

COMMENT:

Surrounding communities to the West Entrance would lose approximately 12.4 million dollars in revenue by closing the entrance. And they [NPS] consider that a negligible amount compared to total economic impact. Well, I don't think the people of West Yellowstone would consider that negligible.

RESPONSE:

The DCIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

The EIS states that the economy in the area is booming, and therefore, the preferred alternative would have a minimal long-term effect. The statement is not true.

RESPONSE:

In the context of the year-round regional economy, the alternatives have a minimal effect - even a minimal current effect.

COMMENT:

The DEIS should articulate the levels of winter use and growth in the businesses that provide support services, especially in the gateway communities, which have occurred in response to federal policies that authorized and, even encouraged, winter use in the parks.

RESPONSE:

The DEIS provides some discussion of historical data for West Yellowstone.

COMMENTS:

Shouldn't this state that the west side of the park is closed to all motorized winter travel? At least that is what is implied by the description of this alternative on page 36. Or should the description on page 36 more specifically state that nonmotorized travel is restricted to designated routes in the front country and the backcountry (or remainder of the park) is closed to all nonmotorized travel?

At what 2 locations will use levels be limited? Colter Bay and Flagg Ranch?

SUMMARY RESPONSE:

The actions that would be taken are correctly described for each alternative in Chapter II. Effects analyses of the various alternatives respond to the actions particular to an alternative. The FEIS will correct any such inconsistencies in the DEIS. The determination of carrying capacities, long term, will most likely focus on how many visitors (of the types allowable in the final selected alternative or plan) can enter the park on a daily basis and on a seasonal basis.

SOCIOECONOMICS**COMMENT:**

Another possible result of the preferred alternative would be to stress winter services at Mammoth and at Cooke City.

RESPONSE:

Survey data does not show much substitution.

COMMENT:

You also estimate that plowing the road will result in a \$12.4 million decrease in visitor spending. This fact should be enough to stop alternative B dead in it's tracks. I don't understand how you could support such a drastic cut in visitors and in economic impact.

RESPONSE:

From the perspective of the regional economy, this is a minor change.

COMMENT:

Are we going to subsidize businesses at places like Yellowstone for revenue lost, revenue they depend on from winter recreation to financially survive through the otherwise off months.

RESPONSE:

Many businesses have seasonal earnings that have to carry them through the remainder of the year - such as farmers.

COMMENT:

The socioeconomic impacts of each of the alternatives needs to be more clearly displayed. Having the state's write up separate from the socioeconomic section of each alternative is confusing and essentially eliminates useful comparison of the alternatives. Much of the quantitative impacts need to be summarized in tabular format so that comparison between the alternatives can be more easily understood. We strongly recommend that socioeconomic impacts be displayed and discussed down to the county-level whenever feasible. We also recommend that a summary table, or set of tables, be developed to display the various socioeconomic metrics for all alternatives.

RESPONSE:

The section from 305 to 314 in the DEIS is being revised to incorporate new data from the cooperators and to better present the information. County-level impacts would be too disaggregated and will not be developed.

COMMENTS:

Consistent with their responsibility as a cooperating agency, the 5 adjoining counties developed data to document the economic impact of winter use. In the Winter Use Plan Draft EIS, this economic impact is then compared to the total economic activity of 17 counties surrounding the Yellowstone/Grand Teton area. The net effect of this contradictory comparison is to dilute the economic impact resulting from actions taken by the NPS. This is not only a statistically invalid analysis, it is patently unfair.

Analyzing a 17-county area is not looking at the true economic impact of the Park's decision on the five counties that actually border the Park.

RESPONSE:

The FEIS is being revised to evaluate the 5-county impact.

COMMENT:

We reiterate the view stated above that the major negative economic impact on West Yellowstone and other gateway communities caused by alternative B is the relevant evaluation criteria, not the multi-county/state assessment. As we look at this material in context with the extreme lack of support among current winter users for plowing the road between West Yellowstone and Old Faithful, and the inability of NPS planners to document whether this new service provides an opportunity to an interested yet unserved public that could actually act on it, we continue to question the responsiveness of this alternative to the issues at hand and its balance in addressing them.

SOCIOECONOMICS**RESPONSE:**

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198. It is up to decision makers to judge how they will weigh the competing perspectives.

COMMENT:

If the preferred alternative B is implemented then the integrity of the Loop is violated and this will have a dramatic impact on the number of winter visitors. There will also be significant socio-economic impacts on the East entrance by eliminating access by snowmobile to West Yellowstone on Super Bowl Sunday and Presidents Day Weekend.

RESPONSE:

The DEIS evaluates the implications of changes in visitor access based on responses of the actual users of the Grand Loop, as well as all other users. The DEIS provided impact analysis that nets out projected increases and decreases.

COMMENT: The DEIS hasn't accurately considered the impact of this alternative in terms of dollar amounts and jobs on surrounding communities.

RESPONSE:

The FEIS is being revised to evaluate the 5 county impact. The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

The economic impact of this action will be in excess of \$87 million in visitor spending (avg. 66,000 visitors x \$1,324/visitor (\$774 direct and \$550 indirect) - Taylor, University of Wyoming 1995) and will be devastating to the local economies of Gardiner and West Yellowstone, MT.

RESPONSE:

FEIS is being revised to incorporate alternative impact analysis provided by the cooperators.

COMMENT:

The gateway communities have weathered many changes in their economies, and the Citizens' Solution would afford the opportunity for healthy economic diversification in these communities, many of which have lost business from a variety of users as snowmobiles took hold as the dominant use (e.g. pers. comm., Craig Matthews, owner, Blue Ribbon Flies; pers. comm., Kelli Criner, owner, Freeheel and Wheel, pers. comm.). The snowmobile business will not disappear; popular snowmobiling areas surround the parks. Indeed, the average visitor to West Yellowstone, MT spends only one day of a multi-day visit snowmobiling inside of the park (pers. comm., David McCray, owner TwoTop Snowmobiles).

RESPONSE:

This comment helps interpret the survey data findings and will be incorporated in the EIS.

COMMENTS:

The preferred alternative would have a major impact on West Yellowstone because of the number of snowmobile concessions and the fact that they advertise themselves as the "Snowmobile Capitol of the World." The Jackson area would also be impacted because of the increased snowmobile traffic that may/will use the South Entrance to enter Yellowstone on a single user motorized vehicle.

Even if we agreed with the \$13,750,000 loss NPS presents in the DEIS and it is generally accurate, we strongly disagree that it will only have a "minor impact" on the economy.

If these changes occur, they will be devastating for West Yellowstone or may have unintended consequences for other gateway communities.

SOCIOECONOMICS**RESPONSE:**

The FEIS is being revised to evaluate the 5-county impact. The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

Each county has submitted detailed analysis of specific economic effects. A common theme throughout these studies is the importance of the winter season to the overall viability of our businesses, and we urge NPS to appropriately incorporate this information into the EIS.

RESPONSE:

FEIS is being revised to incorporate alternative impact analysis provided by the cooperators.

COMMENT:

Paragraph 5 suggests that "new users" who have to date been unresponsive to Yellowstone Park's winter use opportunities may be attracted by the new access services offered under this alternative and that would lessen the economic pain caused gateway communities. NPS cannot provide any information on the number of "new users" who would actually act on this opportunity. There is a very good chance that the economic blow hitting the gateway communities would remain severe.

RESPONSE:

The DEIS and winter survey report identify the expected net change and in the latter increases and decreases are detailed.

COMMENT:

In addition, we reiterate our earlier point (Recreation Sector and Park Visitors comments) about the interconnected nature of a healthy winter visitor economy to the West Yellowstone community's ability to serve the Park's more numerous warm season visitors. Alternative B's major negative impact on West Yellowstone's economy jeopardizes the community's ability to assist Park managers in the pursuit of providing year long visitor enjoyment, access, and protecting visitor health and safety.

RESPONSE:

In the context of the year-long economy, the possible impacts in West Yellowstone are not major.

COMMENT:

The preferred alternative B in the DEIS proposes to plow the road between West Yellowstone and Old Faithful in winter. This will effectively destroy the snowmobile dependent winter economy of West Yellowstone. This community has come to depend upon winter business to fund approximately one half of the necessary year-round infrastructure and basic service needs. To compound the problem, many summer businesses are now tied to winter enterprises. If this alternative is implemented, summer reliant motels, restaurants, and retail shops will collapse as surely as winter ones will since mortgages and cash flow issues have come to rely upon four seasons of commerce instead of just one.

RESPONSE:

Impacts on local economies was a concern identified in scoping. Data indicates that there could be some impacts. The DEIS provided impact analysis that nets out projected increases and decreases. The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198. There are differing opinions about this issue. The available information indicates that snowmobile businesses would as a group be impacted but not "destroyed." It is possible for viable businesses have seasonal revenues. The significant expenditures by winter recreationists, particularly snowmobilers, is acknowledged in the DEIS.

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COMMENTS:

It's no secret as to the economic impact snowmobiling has in West Yellowstone and at business's and resorts along the Continental Divide Trail.

I have a friend who works in the hotel industry and I realize the importance of snowmobile visitors to the economy of the area.

RESPONSE:

The significant expenditures by winter recreationists, particularly snowmobilers, is acknowledged in the DEIS.

COMMENT:

Also, it should be more carefully explained to the reader that the statistics used in the evaluation are very general. "Services" includes much more than tourism. For instance the health-care industry is included with the "services" portion of our economy.

RESPONSE:

Clarification will be added.

COMMENT:

The claim that the Park Service has that the mean income is wealthy people visiting the Park can't be true.

RESPONSE:

While individuals with a wide range of incomes visit YNP and GTNP, survey data shows that on average these individuals have a higher income than the average citizen.

COMMENT:

What specific mechanisms will be used to "increase by 10% over the 1997 levels, the amount of receipts from park entrance, recreation and other fees"? What was the 1997 level of these revenues?

RESPONSE:

Park fees have increased at a number of parks nationwide.

COMMENT:

One point we would like to add to this section is recognition of the connection between winter visitation and related expenditures and the gateway communities' ability to provide quality services to Yellowstone Park's more numerous summer visitors. Without dependable winter visitation and expenditures it is unlikely that the gateway communities could adequately serve the warm season visitors. If the gateway communities fall short in this regard, that puts more pressure on the Park's services and facilities which are already challenged by current use levels. Recognizing this connection is absolutely necessary for a comprehensive analysis of the impacts caused by changes in Yellowstone Park's winter use management plans. The major negative impacts on the park's gateway communities are not limited to influencing only winter business operations, but year-long operations.

RESPONSE:

It is not obvious that this will be true. Many businesses survive and prosper on seasonal revenues.

COMMENT:

Visitor use (or in this case pre-existing users) should not drive the EIS process.

RESPONSE:

Visitor use is one aspect of impacts for decision-makers to evaluate.

COMMENT:

The economic impact of snowmobiling to local economies appears to have been overstated in many of the studies completed by cooperating counties. For example, Yellowstone Park visitation figures indicate that only 3 percent of winter visitors came through the East entrance. The actual number has been

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declining, and last winter was just under 3,000. A 1999 report titled The Economic Importance of the Winter Season to Park County, WY estimates the economic impacts of a prohibition on winter visitation, something which has not been proposed in any alternative. Interestingly, in the 1999 survey of park and national forest visitors, the use of Shoshone National Forest and other sites to the east were not even mentioned as locations for their recreation by park visitors who snowmobiled or skied in areas other than the park during their visit.

RESPONSE:

The NPS is obligated to incorporate base data and alternative impact projections provided by cooperators. Decision makers can form their own judgments on the data.

COMMENTS:

Visitor experience data provided in the DEIS is more heavily weighted toward the snowmobile enthusiast than other users.

Why is recreation only viewed as the use of noisy ATVs, snowmobiles, those hellish ski boats, overflight planes?

RESPONSE:

With regard to socio-economic impacts, responses by all types of users were used.

COMMENT:

Snowmobilers spend an average of \$200 a day while on vacation, which is higher than the average recreationalist.

RESPONSE: Several survey-based estimates of snowmobile expenditures are used in the DEIS and these generally do indicate higher expenditures by snowmobilers, as the comment notes.

COMMENTS:

Please tell me if you would favor or oppose allowing snowmobiles and other off-road vehicles at national parks such as Yellowstone National Park. — 8% strongly favor; 24% somewhat favor; 6% don't know; 22% somewhat oppose; 40% strongly oppose. (Survey done by Animal Protection Institute, April 1999)

Snowmobiles and recreational off-road vehicles have no business being in national parks— 44% strongly agree; 22% somewhat agree; 4% don't know; 20% somewhat disagree; 11% strongly disagree. (Survey done by Animal Protection Institute, April 1999)

RESPONSE:

This data is informative, but it is difficult to interpret in the context of the plan alternatives since none of them include potentially off-road vehicles except snowmobiles. With regard to snowmobiles, the FEIS will include new data from a national phone survey that shows only 20% of respondents supporting the existing policy of prohibiting for snowmobiler and snowcoach use. However, much higher percentages support the policy at the local and regional level.

COMMENT:

I don't understand the statement that about 70% of all visitors use rented snowmobiles (p.99) when only about 61% of all visitors are snowmobilers. How can that be?

RESPONSE:

The interpretation at p. 99 is that 70% of those that use snowmobiles in YNP rent them.

COMMENT:

If an industry builds up around an illegal and environmentally destructive activity, why should we then use this industry to justify the activity?

RESPONSE:

Public comments and scoping indicate a concern about the impacts on the existing economy.

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COMMENT:

[W]hat is the actual use of Yellowstone National Park by skiers and snowshoers? Could these visitors, alone, sustain the level of maintenance needed to operate Yellowstone and still keep the visit affordable?

RESPONSE:

The 1997 winter survey indicates that 24.2% of YNP/GNP visitors participate in cross-country skiing and 10.3% snowshoe. However, some of these visitors also snowmobile and travel by snowcoach. Maintenance of YNP is not dependent on visitor revenue. Alternative C evaluates snowmobiles and snowcoaches fully as well.

COMMENT:

The Plan and DEIS has ignored the fact that affordable access exists by the means of plowed road from Gardiner to Mammoth (continuing through to Cooke City). The Mammoth Terraces are world famous, magnificent attractions. Yet only 32% of winter visitors enter from Gardiner - and this percent includes traffic that supports the Cooke City infrastructure (residents and commercial). There is no information on how many visit Mammoth as a destination.

RESPONSE:

This point is acknowledged. Every entry is unique in terms of in and out-of-park attractions, infrastructure, access, proximity to population centers, etc.

COMMENT:

The economic analysis for alternative B includes a discussion of minority and low-income populations. What percentage of the survey respondents were from that group? How does one deduce there will be more lower income use if roadway access is provided for personal cars?

RESPONSE:

Justification for alternative B is to provide more affordable access, not specifically to help minority and low-income people, although this would certainly be a desirable goal. The DEIS does not conclude that there will actually be more lower income use if roadway access is provided (see p. 190). A total of 4.6% of winter park visitor respondents had household incomes below \$15,000.

COMMENT:

On page 197 paragraph 4 the DEIS says that "Most of these changes are unlikely to impact visitor decisions on whether or not to visit the parks of recreation." This is for alternative B. I find that very hard to believe if you're talking about snowmobilers.

RESPONSE:

Minor changes in grooming are unlikely to have major impacts on visitation. Major changes such as plowing the road or closing access could have major impact.

COMMENT:

Whether and how many visitors would like to travel by bus to Old Faithful in the winter has not been sufficiently considered.

RESPONSE:

Survey responses indicate that the possible increase in visitors in part due to bus access would be outweighed by the decrease in visits by others, including snowmobilers.

COMMENT:

What about restricting visitors from leaving vehicles and harassing wildlife near the roadways?

RESPONSE:

This is already park policy at present.

COMMENT:

As a result, not only is it possible that the answers provided by the respondents may have been influenced by groups representing a particular perspective on this

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issue, but those who chose to snowmobile in the Parks may have either not understood the environmental impacts of their activity or not cared about those impacts.

RESPONSE:

Strategic answers are possible, but our survey experience is that most people answer honestly. One approach to minimizing the influence of strategic answers is to use medians rather than means to reduce the influence of outliers.

COMMENT:

The fact that surveys of current winter park users strongly support management that emphasizes snowmobile use, should not be used to chart future management direction.

RESPONSE:

It is up to decision-makers to weigh the various factors. Information is presented in the FEIS that includes attitudes and preferences of those who are not current winter users (summer visitors, general public).

COMMENT:

Will people make the trip to Yellowstone in winter if snowmobiling the lower loop is no longer possible? Magical calculations notwithstanding, I believe the answer is no.

RESPONSE:

We expect visitors themselves are the best judges of how they will respond to policy changes; this is the basis of the estimated impacts.

COMMENTS:

We are also wondering about the specifics of the proposed bus shuttle system: would our company be required to provide this service, or would the Park Service solicit bids from other operators for this service?

Will there be provisions made for overnight visitors to park at Madison (at end of the plowed road) while staying at Old Faithful?

Why does it state in this conclusion that there will be an increase in winter visitation?

SUMMARY RESPONSE:

Further details of plan implementation will need to be determined once an overall plan is selected.

COMMENT:

Re: future limits on park visitation. What input is the public going to have in the development of these indicators and standards and what assurances does the public have that this will in fact be completed so that use of the parks does not continue to grow beyond appropriate carrying capacities?

RESPONSE:

The determination of carrying capacities, indicators and standards are subject to future analysis and decision processes. To the extent that future NEPA planning may be involved, the public will have an opportunity to review proposed actions and comment on them. At a certain level in planning, NPS has the discretion to set objectives and standards and to monitor in accordance with them without further public involvement.

COMMENT:

How many non-snowmobiling visitors come to Yellowstone each year?

RESPONSE:

The 1999 winter survey indicates that 24.2% of YNP/OTNP visitors participate in cross-country skiing and 10.8% snowshoe. However, some of these visitors

SOCIOECONOMICS

also snowmobile and travel by snowcoach. Maintenance of YNP is not dependent on visitor revenues. Alternative G evaluates a snowcoach, ski, snowshoe only scenario.

COMMENT:

Are there taxpayers saying it is their right to yahoo through any public area that will accommodate their stupid noisy machines?

RESPONSE:

Since snowmobile use is participated in by 12 to 15 % of households regionally, some of these are certainly taxpayers.

COMMENT:

From a plowed road what can a visitor see?

RESPONSE:

Plowed roads will limit views as noted.

COMMENT:

If the economies in these small towns, which depend largely upon tourism, are severely impacted, jobs will be lost.

RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198.

COMMENT:

The DEIS estimates that plowing the road from West Yellowstone to Old Faithful will result in a \$12.4 million decrease in visitor spending and the loss of 301 jobs in the Greater Yellowstone Area (GYA). (Vol. 1, page 198) The surrounding states estimate that this loss will actually be over \$100 million in visitor spending and more than 1,000 jobs in the GYA [Vol. 2, Appendix].

RESPONSE:

The NPS is obligated to incorporate some data and alternative impact projections provided by cooperators. Decision makers can form their own judgments on the data. The FEIS is being revised to incorporate alternative impact analysis provided by the cooperators.

COMMENTS:

The small town of West Yellowstone, Montana will have its winter economy impacted without snowmobile access to the park.

Eliminating snowmobiles in Yellowstone would result in the loss of even more jobs.

RESPONSE:

The DEIS concludes that there will be a "major negative impact" on the West Yellowstone winter economy, p. 198. However, 300 jobs lost is not just West Yellowstone.

I think that encouraging use by mass transit is going to give a lot of jobs out there for people to be guides in the Park.

RESPONSE:

There will be offsetting uses to some extent if snowmobile use is curtailed, as shown in the DEIS.

COMMENT:

By moving the staging area from Flagg Ranch to Colter Bay, winter operations at Flagg Ranch would be severely hindered. They need regular delivery of fuel, propane, food and other goods and services to exist through their winter season. If this action were implemented, this concession would most likely have to close during the winter, which would also affect their ability to offer services during the winter due to lost cash flow from their winter season.

PUBLIC COMMENTS

RESPONSE:

The primary concern about winter use is an adequate protection of the resources that people visit the park to enjoy. NPS understands that there is a financial and otherwise, that Flagg Ranch has in winter use. However, changes are indicated for winter use and the need to protect resources will be coordinated with Flagg Ranch through the permitting/concessions process. NPS believes that with some changes could come new opportunities.

COMMENT:

Plowing of the roads will decrease the income to the NPS.

RESPONSE:

This appears to be true, since visitation will decline.

COMMENT:

The survey data, which show the "estimated median willingness to pay for the plowing to be \$6.14 per person," indicate that other sources of revenue will have to be tapped by the Park Service just to keep the road open.

RESPONSE:

This finding indicates a relatively low value for this service.

COMMENTS:

At best, the positive effects of plowing would merely offset the negative effects, and at worst would decrease accessibility to low income groups.

People of lesser income can access the park with their families by snow machine. If you restrict access and force bussing into the park, only the rich could access the Public's park.

RESPONSE:

It is difficult to see how plowing or bus access would reduce low income access.

COMMENT:

Once established, the mass-transit system would be more affordable to a wider range of public since renting snowmobiles is so cost-prohibitive.

RESPONSE:

Yes, this is the stated intent of alternative B.

COMMENT:

Another concern I have with plowing the West Yellowstone to Old Faithful route is the potential for increased visitation. Facilities in the park are already inadequate for the number of winter visitors. In particular, at Old Faithful, the Visitor Center, warming hut, Snowlodge dining areas, and parking lots are already overcrowded. If the number of visitors greatly increases, how will they be accommodated? Removing garbage and waste in the winter is an issue as well. Not to mention the impact of increased visitation on wildlife and natural features.

RESPONSE:

The impacts of all alternatives are discussed in Chapter IV of the EIS.

COMMENT:

What kind of people is the park catering too (sic)?

RESPONSE:

The park is open to the public. The type of access provided does affect who would prefer to come.

SOCIOECONOMICS**SUMMARY COMMENT:**

The inordinate amount of air and noise pollution associated with these vehicles threatens the beauty, serenity and enjoyment of accessible areas of the park.

SUMMARY RESPONSE:

The purpose and need for change is well explained in Chapter I of the EIS. Current management is shown to be inadequate in many respects related to visitor experience and effects on park values and resources. These are reflected as impacts disclosed for alternative A in Chapter IV of the EIS. The possible benefits and impacts of all other alternatives are also discussed in Chapter IV.

SPECIES OF SPECIAL CONCERN

SUMMARY COMMENT:

Many people requested more information on species of special concern.

SUMMARY RESPONSE:

The FEIS contains an expanded discussion of impacts to park species of special concern, including pertinent habitat requirements and life history information. See Chapters 3 and 4. Alternative A contains a complete review of each species; subsequent alternatives are then compared and contrasted to alternative A.

SUMMARY COMMENT:

Commenters were concerned about the use of avalanche control measures on denning wolverines.

SUMMARY RESPONSE:

The FEIS mentions the potential impact of avalanche control measures on wolverines.

SUMMARY COMMENT:

The definition of Species of Special Concern is confusing, and so is the list of species.

SUMMARY RESPONSE:

The definition was revised in the FEIS, and a clarification was made as to why certain animals are included on the list.

COMMENT:

Since snowmobiles are able to travel in all kinds of terrain, they enter areas that should be winter refuges to species such as lynx and wolverines. This adds an additional and unnatural stress to these animals that, to me, seems completely counter to the Park Service mission.

RESPONSE:

Snowmobiles are required to stay on designated roads and routes in the parks. They are not permitted in the backcountry. The FEIS contains an expanded discussion of the impacts to Species of Special Concern and Park species.

SUMMARY COMMENT:

Commenters were concerned about the effects of snowmobiling and groomed roads on trumpeter swans.

SUMMARY RESPONSE:

The FEIS contains an expanded discussion about the impacts to trumpeter swans from snowmobiling. Alternative A contains a complete review; subsequent alternatives are then compared and contrasted to alternative A.

THREATENED AND ENDANGERED SPECIES

SUMMARY COMMENT:

Commentors pointed out a naming error for the Canada lynx.

SUMMARY RESPONSE:

The proper name for the Canada lynx was used in the FEIS.

COMMENT:

Threatened and Endangered Species (page 120) Page 123, Canada Lynx: "However, remnant populations persist. Although on a broad scale this may be true, in Montana, presence of lynx has been documented in all the major habitat areas that one would expect lynx populations to exist in. To apply the qualitative assessment broadly is to imply something that may not exist at least north of YNP in Montana. To date we know of no studies that have quantified the relative abundance question in these areas, but distribution has been well documented at least in the areas north of YNP to Canada.

RESPONSE:

A correction regarding lynx distribution was made in the FEIS.

SUMMARY COMMENT:

Commentors wished to see a depiction of lynx habitat in the parks, and an expanded discussion about impacts to lynx and conservation strategies.

SUMMARY RESPONSE:

A lynx habitat map and a map of lynx observations for the three parks are included in the biological assessment published concurrently with this document. NPS is cooperating with the US Fish and Wildlife Service to develop a conservation plan for lynx, and the FEIS and the biological assessment contain a revised discussion of lynx.

SUMMARY COMMENT:

The DEIS failed to adequately discuss the impacts of snowmobiles and groomed, packed roads and trails on lynx and other species.

SUMMARY RESPONSE:

A discussion of how packed snow routes affect lynx and other species, including F&E, is included in the FEIS and the biological assessment. The discussion of impacts related to all winter use activities was expanded in the FEIS.

SUMMARY COMMENT:

Commentors were concerned about the effects of recreation during the pre- and post-denning period.

SUMMARY RESPONSE:

The FEIS (see alternative A for the complete review) and the biological assessment contain a revised discussion of grizzly bears and impacts associated with the pre- and post-denning periods.

COMMENT:

Several commentors provided additional citations or information to support their position on whether or not snowmobiling or plowing affects federally listed species.

THREATENED AND ENDANGERED SPECIES

RESPONSE:

The FEIS contains an expanded literature review, but did not attempt to include every suggested reference. The CBO regulation also requires extensive and sometimes distracting, especially when the discussion is background and adding needless detail (51 FR 41317). The amount of detail by included in an FEIS should be that level which is relevant to the decision to be made, and providing analysis as opposed to only listing the documents (51 FR 41317). The regulation also imposes a page limit on documents, which the FEIS already exceeds. Finally, the regulation at 51 FR 21 (the expansion by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute transparent disclosure. In addition, effects on federally protected species associated with the preferred alternative are assessed in the biological assessment.

SUMMARY COMMENT:

Commentors suggested ways to improve the discussion related to wolves.

RESPONSE:

The discussion of wolves in the FEIS was revised.

COMMENT:

In a report authored by the Wyoming Game and Fish department, researcher (sic) speculate that recreational snowmobiling adversely affects the survival rate of the American Bald Eagle by disrupting nest initiation at a critical time, causing failure of egg incubation.

RESPONSE:

The inclusion of nesting in the parks coincides with the decline in use of snowmobiles. See the FEIS (alternative A contains a complete review) and the biological assessment for a review of impacts to bald eagles in the parks.

COMMENT:

p. 122 Bald Eagle - Bald eagles have met their recovery criteria and are expected to be delisted in the year 2000, maybe before the ROD is signed.

RESPONSE:

This information is included in the FEIS and the biological assessment.

COMMENT:

Bald eagle nest sites in Grand Teton National Park that are in the vicinity of snowmobile use areas have been notoriously unproductive and intermittently occupied.

RESPONSE:

NPS wonders where commenter obtained this information. It is unsubstantiated.

COMMENT:

Please adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability on its beleaguered but fragile thermally influenced habitat and vegetation.

RESPONSE:

An expanded analysis of the impacts on grizzly bears associated with winter use is contained in the FEIS (see alternative A for a complete review) and the biological assessment.

SUMMARY COMMENT:

The evaluation of impacts to T&E species is inadequate.

THREATENED AND ENDANGERED SPECIES

SUMMARY RESPONSE:

NEPA requires that it has satisfied its obligation to disclose the impacts of winter recreation on the relevant resources, including federally protected species and species of special concern. The CEQ regulations do not require exhaustive and voluminous disclosure, especially when the discussion can be constructed to be pertinent and aiding decision makers (§1500.4 (b)). The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analysis is governed by categorical documents (§1500.6 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at §1502.27 (incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Inevitably and necessarily by reference of large amounts of literature in the MEIS and in the FEIS, does not constitute inadequate disclosure. The commenters will find, however, additional information in the FEIS and biological assessment on the effects of winter recreation on wildlife (including federally protected species and species of special concern).

SUMMARY COMMENT:

Commentors were concerned about the effects of lengthening the winter use season on grizzly bears.

SUMMARY RESPONSE:

The potential effects of lengthening the winter use season on grizzly bears are disclosed in the FEIS.

COMMENT:

Couldn't find out if grizzlies hibernate, if not, wouldn't less noise create the possibility of more conflicts with humans?

RESPONSE:

The comment is referred to the FEIS and the biological assessment for information on grizzly bears.

SUMMARY COMMENT:

Commentors expressed concern over the impacts of groomed and plowed roads on wolves.

SUMMARY RESPONSE:

The effects of groomed and plowed routes on wolves are discussed in the FEIS and the biological assessment.

COMMENT:

There should be a study to determine if wolf numbers should be controlled so that they do not stray outside the park boundaries and into surrounding communities and into our Bighorn Sheep herd.

RESPONSE:

Wolf management and related activities associated with the reintroduction effort are outside of the scope of the Winter Use Plan.

COMMENT:

The DEIS is severely flawed and inadequate because it fails to seriously consider a no snowmobiling, no trail grooming alternative.

RESPONSE:

It is within the discretion of the decision maker to set the range of alternatives to be considered. How can the decision maker assess the impacts of an action without considering an alternative that includes it? If there is doubt about the level or type of use that might be acceptable, referred to impacts and management alternatives, then how can a determination be made without an appropriate range of alternatives? NEPA requires a "no-action" alternative (§1502.20(b)). In this case, since authorized use exists, and was sanctioned in the past under existing rules, policies and plans, "no-action" is correctly interpreted as the existing management situation. CBM directly supports this position. In opinion is that in instances where ongoing programs are being evaluated, "no-action" is "no change" from current management direction or level of management intensity. In these instances, CEQ states: "To construct an alternative that is based on no management at all would be a serious academic exercise (Question 3 of CEQ 40 Most Asked Questions)."

SUMMARY COMMENT:

NPS failed to adequately disclose and assess impacts to T&E species on adjacent lands.

COMMENT:

It also should be noted that the settlement agreement requires the NPS to prepare a biological assessment and to request formal consultation with the U.S. Fish and Wildlife Service. In addition, as a reminder, the NPS must make its biological assessment available to the public upon completion. Since the NPS has not released its assessment, it is assumed that the assessment has not been completed.

COMMENT:

While direct snowmobile impacts on grizzlies are limited due to grizzly denning during the peak period of snowmobile use, it is now clear that indirect impacts may adversely affect grizzlies in the Parks. Indirect impacts result from the altered distribution and movement patterns of large ungulates, particularly bison and elk, caused by snowmobile trail use and the consequent availability of carrion.

COMMENT:

Air pollution impacts to Park vegetation may be another indirect effect of snowmobile use on grizzlies. These impacts may affect all components of the food chain, including grizzly bears and other threatened and endangered species, as a result of bioaccumulation of toxins in Park herbivores (See Shaver et al, 1988). In the parks, however, little research into such affects has been conducted.

SUMMARY COMMENT:

The amount of carrion available to grizzlies in the spring is significantly reduced because animals die near groomed trails which are avoided by grizzly bears.

SUMMARY COMMENT:

General expressions of support for or in opposition to: grooming; snowmobiles; snowcoaches; plowing; regulating backcountry use; the number of visitors, and mass transit.

COMMENT:

Although the DEIS notes that winter recreation use along road corridors may cause eagle avoidance of prime nesting habitat, the preferred alternative provides little in the way of mitigation. In GTNP, nests are only protected as discovered (page 122) and no proactive steps are taken to protect this species.

COMMENT:

The primary effect of winter use in Yellowstone on grizzly bears is on the bison that are potential prey for grizzly bears. As mentioned above, bison use the packed trails to leave the park, and under the current management policy many of them are killed at the park border, thus lost to the bears as a potentially important food item. The Winter Use EIS fails to address this problem in its analysis, and its preferred alternative might only exacerbate this problem, since a plowed road would make for an even easier travel corridor than a packed trail, and the implementation of mass transit would result in reduced displacement of bison from the park roads.

COMMENT:

Several comments were received that pertained to the effects of various winter activities on grizzly bears, including noise, disturbance, snowmobiling, plowed and groomed roads, the availability of carrion, and the length of the winter use season.

THREATENED AND ENDANGERED SPECIES**COMMENT:**

Another issue regarding grizzly bears that has not been adequately addressed in the DEIS is the increased use of carrion by bears over the winter. Due to the presence of wolves, and the carrion they provide, grizzly bears are beginning to make significant changes in their winter habits. Already we've seen a few bears delay hibernation, bears emerge during the winter to utilize wolf kills, and other bears emerging earlier in the spring. As bears learn about the presence and certainty of finding wolf-killed carrion, they will be seen more and more often during the winter months. Throughout the DEIS there is a tendency to dismiss the problems of bear management during the traditional hibernation period. We believe that the Park Service, in its Winter Use Plan needs to plan ahead to the human impact to bears that choose to emerge during the winter.

RESPONSE:

This comment refers to Glacier National Park where a few bears have scavenged on carcasses provided by wolves and mountain lions during the winter. To date, no conflicts with humans have resulted from this activity. In the GYA, grizzly bears have not been documented to exhibit this behavior.

SUMMARY COMMENT:

Commentors were concerned about off-trail snowmobile use and how it might affect denning grizzly bears.

SUMMARY RESPONSE:

NPS enforces the regulation that requires snowmobiles to stay on roads and designated routes to the best of its availability. Impacts of snowmobiles on denning bears may be more of an issue on US Forest Service lands where snowmobile use is largely unrestricted outside of wilderness and winter range closures. The FEIS and biological assessment contain information on the effects of snowmobiles on denning bears on adjacent lands.

COMMENT:

Snowmobiles are a threat to grizzly bears. The primary problem for grizzly bears comes as the use of snowmobiles increases in the Greater Yellowstone Ecosystem after bears have emerged from their dens, approximately in mid-April. Snowmobiling is becoming increasingly popular as spring conditions create more stability for snowmobilers. Expanding snowmobiling use also increases pressure for "shoulder season" development, which also puts additional stress on grizzlies at key times of the year. The future of grizzly bears is severely threatened in the Greater Yellowstone Ecosystem and the survival of the grizzly bear is in jeopardy which is one more reason that snowmobiling should be banned in Yellowstone and Grand Teton National Parks and in the John D. Rockefeller Parkway.

RESPONSE:

The Winter Use Plan only permits to the winter use season in the parks, which ends by mid-March.

COMMENT:

Lynx are very sensitive to disturbances and will move their dens when cross-country skiers or snowmobilers come close to where they're raising their young.

RESPONSE:

The winter use season in the parks does not overlap with the denning period for lynx. See the FEIS and biological assessment for a discussion of lynx.

VEGETATION

SUMMARY COMMENT:

Several commentors provided additional citations or information to support their position on whether or not snowmobiling or plowing affects vegetation.

SUMMARY RESPONSE:

Vegetation, with the exception of rare plant species of special concern, is not discussed in the FEIS – see “Impact topics discussed”. This section mentions the possibility of damage to roadside vegetation caused by plowing. Commentors note the fact that snowmobiling is limited in the parks to roads or the shoulders and therefore impacts to vegetation are somewhat limited as to vegetation.

COMMENT:

If there is any good science in the report indicating detrimental impact on the flora and fauna resulting from snowmobile emissions then I am sorry I missed it, but there is certainly no such detrimental impact observable to Park visitors.

RESPONSE:

The impact of groomed surfaces and how they may facilitate the transport of toxins into the aquatic environment is more appropriately addressed by directly speaking to the pollution and erosion of the lakes. Additional information in the form of a final published report (dated 2008, *Effects of Snowmobile Use on Snowpack Chemistry in Yellowstone National Park, 1993*) has become available since publication of the FEIS, and is incorporated into the final document.

SUMMARY COMMENT:

General expressions of support for or in opposition to: grooming; snowmobiles; snowcoaches; plowing; regulating backcountry use; the number of visitors, and mass transit.

SUMMARY RESPONSE:

Comments made in support of, or in opposition to, a project or action will be responded to when the decision actions are developed, and accordingly, when the response to the comments is presented in the Record of Decision. Comments who commented in this fashion are asked to consider that there is a very close relationship between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.

COMMENT:

There at least a dozen published studies documenting the damage to animals and plants by the mechanical compaction of snowfields.

RESPONSE:

Snowmobiling in the parks is restricted to designated roads or routes; consequently, snowfields are not impacted.

COMMENT:

p. 126 plants – there are a bunch of plants on the Forest Service sensitive lists and probably on the state lists of species of special concern – they aren't discussed at all – only one species of plant is discussed – is this sufficient?

Response: NPS policy requires that an assessment be made of impacts to those species that are considered of special concern in the parks. Because the vast majority of impacts are due to the winter season, the discussion of plant species of special concern was moved to “Impact topics discussed” in the FEIS. This is consistent with CEQ section 1502.15 which states that “data and analysis shall be comprehensive with the importance of the impact” and allows for other material to be summarized or referenced. A brief discussion of the Yellowstone Sand Verbena is included in the FEIS.

VISITOR ACCESS AND CIRCULATION

Separate Year-Round Pathway in GTNP**COMMENT:**

It is also my understanding that it is against current National Park Service Policy to allow mechanized vehicles off existing roadways. If a trail is cut away from the highway, ATVers are going to demand their rightful use of that road in the summer as well.

RESPONSE:

Once a trail or route is established, any need to depart from the existing regulations would be identified. The separate pathway for GTNP is a case in point. The environmental analysis would specify the types of use allowed on the pathway. This is represented in the alternative as a snowmobile trail in the winter and a bicycle/horseback trail in other times.

East Entrance/Washburn Pass**COMMENT:**

For the level of use that is or can be expected on the groomed route over Sylvan Pass or the ungroomed route over Washburn Pass, neither grooming nor avalanche control is justified.

RESPONSE:

The comments given in the decision to be made. It is up to the decision maker to select actions or changes in management and justify them in the record of decision. Neither grooming or avalanche control are proposed for Washburn Pass.

Impacts of Plowing the Road**SUMMARY COMMENT:**

Plowing the road from West Yellowstone is unjustified because it would have a number of effects: would simply transfer snowmobile pollution, noise, and congestion to other road segments while adding automobiles to the mix; would be too costly; would be impossible to keep open; it will promote rim riding and illegal access; inspire snowmobilers to cut new routes in previously unused areas; pollution from autos, diesel buses, etc. on the plowed section; more crowding by day users;

RESPONSE:

The impact of plowing the road from West Yellowstone to Geyser Road (alternatives B and C) are discussed to the degree necessary in the FEIS. Any comments referring to the justification for this action, or the lack of it, go to the decision to be made. References to this action, or its justification for this action, in the preferred alternative are no longer pertinent due to the rejection of a new preferred alternative in the FEIS.

COMMENT:

One other thing that I did not see addressed is the amount of anticipated closure time that will result from plowing roads. What happens when winter storms hit the area? Is the road going to be closed or will plows work round the clock to keep the road open?

RESPONSE:

The intent of this alternative feature is to have the road open for wheeled vehicle access. The intensity of the plowing effort depends on funding, personnel, and material available to do the job - as it does with any plowed road in any jurisdiction within the greater Yellowstone area.

COMMENT:

By adopting the preferred alternative of plowing the road the Park Service is ignoring the preferences and desires of the majority of visitors who utilize the Park in the winter.

VISITOR ACCESS AND CIRCULATION

RESPONSE:

NPS claims that the majority of visitors who were surveyed in the parks were snowmobiles. It is reasonable to conclude with or without the survey that snowmobiles would prefer the snow and - to continue to access the park using snowmobiles. This is a consideration for the decision maker, who must also consider the desires and preferences of all others who are interested in the park. Many people expressed the preference for snowmobile use. However, the primary consideration for the decision maker is the desire to which interpretation, or other uses provided by the analysis, affect the resources and values associated with the park. The decision is not subject to a vote.

COMMENT:

Will there be plentiful turnout areas provided?

RESPONSE:

Turnout areas will be provided as necessary for road areas and scenic views.

COMMENT:

What damage would the cleared snowcoach tracks do to the already severely compromised roads of Yellowstone?

RESPONSE:

The fleet of snowcoaches with cleared tracks is not expected to grow any larger than at present.

COMMENT:

With the amount of snow this region receives, where in the Old Faithful area or many miles of the road is the plowed snow going to be stored?

RESPONSE:

This is a technical issue that can be solved during implementation. In capacity analysis parking capacity was reduced by at least 50% to accommodate snow storage.

Affordable Access and Access for Disabled People

COMMENT:

There is a statement that plowing the road will provide a less expensive alternative to snowmobiles but the data from the winter use surveys does not support your conclusions that the majority of people need or want a less expensive alternative.

RESPONSE:

The winter use survey is not the sole source of information, nor is it reflective of management issues or resource concerns. Similarly, it does not sample a population that might wish to access the park if it were more affordable. It samples only the people who clearly can afford to be there at the season long.

COMMENT:

Regarding conclusions for visitor access & circulation, it is concluded that access under alternative A is costly. The same conclusion must be reached for each and every alternative.

RESPONSE:

Certainly it is costly under all alternatives. The intent in alternative B is to make it less costly in areas that the park service can most be some control.

SUMMARY COMMENT:

My principal concern with ALL the alternatives as written is that they do not adequately address access by the disabled that may have an impact on the environment and would have an impact on visitor experience.

VISITOR ACCESS AND CIRCULATION

SUMMARY RESPONSE:

Access for the elderly, or for mentally and physically disabled citizens, is best afforded through any mass transit systems, bus or snowcoach. Any one who can ride a snowmobile can ride a bus – therefore, it is not a matter of access but of preference.

SUMMARY COMMENT:

Americans should be provided affordable access to the splendor of Yellowstone during the winter months in a manner which best protects park resources.

SUMMARY RESPONSE:

Part of the reason for alternative B is to make access to the park's interior more affordable.

SUMMARY COMMENT:

So where is the analysis of what it costs these companies in relation to what the Park Service is going to charge or needs to charge of a bus ride to Old Faithful and back.

SUMMARY RESPONSE:

A detailed analysis will not be done. For purposes of developing a plan it is sufficient to know that mass transit via snowcoach, as a currently available form of winter access, is feasible. Also, if bus and van mass transit access is a service that people use in the summer, it seems reasonable that they would use it during the winter. Costs of the service are bearable for a sufficient number of customers and obviously profitable enough for providers to continue the service.

Costs

COMMENT:

The DEIS fails to answer what funds would be funneled to YNP to plow and maintain the road from West Yellowstone to Old Faithful. The cost of plowing can't be economical; more expensive for taxpayers, and dollars should be spent instead on other problem areas such as a neglected and aging infrastructure.

RESPONSE:

Such a disclosure is not necessary in an EIS of this type to determine a plan. Administrative and maintenance costs by alternative are shown in Appendix F of the EIS. The cost of grooming and the cost of plowing on the average are not substantially different. Plowing will create frost heaves as big as a house.

SUMMARY COMMENT:

The NPS must disclose and discuss the impact of grooming and plowing on the road surface since this constitutes yet another impact of snowmobile recreation on the Parks, non-winter park visitors, public safety, and on park budgets. Need to anticipate the cost of plowing the road on the road surface – damage to pavement.

SUMMARY RESPONSE:

These costs are figured into the estimates of cost by alternative found in Appendix F.

SUMMARY COMMENT:

The plowing of roads would most likely cause more accidents due to the inability to keep the roads snow and ice-free. To keep them safe would require the usage (sic) of chemicals or a salt solution.

SUMMARY RESPONSE:

More accidents are possible, particularly in alternative C which would have less regulated traffic on the plowed section. Replacing the large volume of snowmobile/snowcoach traffic in alternative B with scheduled and limited mass transit wheeled vehicles (with trained and experienced drivers) appears to be relatively more safe. Salt and chemicals are not used on snowy roads in the park – sand is used.

SUMMARY COMMENT:

The costs for this alternative [B] should either include the cost of the bus system if run by the Park Service or provide an analysis justifying the estimated fares for a private contractor. The alternative should also address whether or not a subsidy from the Park Service would be necessary to keep the fares at a reasonable level.

COMMENT:

The preferred alternative [B] is the second most expensive, and it does not consider increased costs of road maintenance, costs of the buses, the maintenance of the buses, the personnel for the buses, the personnel for the plowing, and the increased policing of the Old Faithful area.

COMMENT:

In the section for the GTNP unit costs, there is a figure for a year round pathway listed at \$27,300,000. At a minimum, the cost of the pathway should be broken out from the cost of burying the utility line. Pathway costs in similar terrain in Teton County pathways have come in at under \$50 per linear foot, or \$250,000 per mile in round numbers. For a 22-mile pathway, this would be an estimated cost of \$5.5 million. I can't see how the \$27 million number was developed.

COMMENT:

In the list of unit costs for YNP, Grooming snow road is \$27 per lane mile per day, yet the cost of grooming ski trail is \$468 per mile. Is the ski trail per day or per year?

COMMENT:

The expense of maintaining a campground at Colter Bay is unjustified. If some limited spaces for campers are to be provided, this should be at Flagg Ranch, since the highway will be kept open to there.

COMMENT:

This alternative seems that it would be the most expensive because of all the roads being groomed and built in the addition to what already exists. In the creation of all these roads, the first National Park, Yellowstone loses its natural beauty.

Snowcoach Access**SUMMARY COMMENT:**

Allowing only snow coaches in would provide access chiefly for the wealthy.

SUMMARY COMMENT:

Access by snowcoach (only) will allow better control of use and better access for more citizens including the elderly and disabled.

SUMMARY COMMENT:

While snowcoaches may carry up to ten people there will, no doubt, be smaller groups whose transportation needs would not be compatible with enough others to fill up a coach. In these cases it may not be affordable or feasible to operate a snowcoach for a small group.

Alternative B: Bus Access**COMMENT:**

How will skiers and their equipment be handled? Will there be special buses for those who will stay in the park versus those just going in for a day trip?

SUMMARY COMMENT:

As it is now, every individual who enters the park on a snowmobile pays the entrance fee. Will everyone who enters in a tour bus pay this amount? If not, who is subsidizing their entrance, the taxpayer?

Facilities and Services**COMMENT:**

I question the need for establishing 6 additional miles of new over-snow motorized trails in Yellowstone.

VISITOR ACCESS AND CIRCULATION	
RESPONSE:	The desire for an additional oversnow motorized trail experience was raised as an issue during public scoping. The issue was addressed in an alternative and the effects of providing these additional experiences (both good and bad) are disclosed in the EIS.
SUMMARY COMMENT:	The DEIS&P should provide more details as to how these routes and trails are groomed, and the maintenance requirements of the roadway.
SUMMARY RESPONSE:	Details of implementation such as these are not necessary in analysis for a broad, programmatic plan. See Appendix F for cost itemized estimates.
SUMMARY COMMENT:	If we can't ride snowmobiles into the park, why would we need snowmobile trailer parking space?
SUMMARY RESPONSE:	Alternatives B and C do not preclude snowmobile use in the parks.
COMMENT:	Would facilities at Flagg Ranch, other than being a staging area, remain open?
RESPONSE:	In all alternatives, NPS indicates that Flagg Ranch would remain open.
SUMMARY COMMENT:	Parking at Old Faithful will be very limited and inadequate – how will the parking area be cleared when there isn't enough room to put the snow.
SUMMARY RESPONSE:	Capacities for parking at Old Faithful were calculated at 50% to allow for snow storage.
SUMMARY COMMENT:	How many vehicles will be allowed in the park? How would reservations be made - first come, first served, a lottery? Would a certain number be reserved for private individuals as opposed to tour operators? Would there be any sort of restrictions placed on the number of snowmobiles from the South or East Entrances? If not, doesn't that discriminate against those entering from the West Entrance? Would space be reserved for those who want to drive their own vehicle into Old Faithful? Would those staying at the Snow Lodge get preference for parking over those just making a day trip?
SUMMARY RESPONSE:	Scenarios of winter visitation may be found in the FEIS under visitor access, and in Appendix J. In alternative B, the general public would for the most part not access Old Faithful from West Yellowstone using personal vehicles. Some parking would be provided by reservation system. In alternative C, there would be less reliance on a mass transit shuttle system in favor of personal wheeled vehicle access. Parking would be limiting, but it is feasible to clear enough space to facilitate overnight stays at the lodge and some day parking.
SUMMARY COMMENT:	The effect of this action is that people will have to fill up at Old Faithful, and the fuel there will be severely impacted and will need to be increased to meet demand which has been artificially created by NPS action.
SUMMARY RESPONSE:	The present demand is artificially created in the same sense, because NPS allows access into the parks during the winter. Visitors have adapted to the existing situation and they can adapt to new ones. This is a routine function of management in the NPS/public relationship.

VISITOR ACCESS AND CIRCULATION

COMMENT:

In the alternatives to plow the road and provide parking places at Old Faithful the document shows a calculation of numbers of snowmobiles that would use the area and that calculation says 5 snowmobiles per trailer. I have checked the market for trailers and have not found a 5-snowmobile trailer. Where did this number come from?

RESPONSE:

An average group size was mistakenly used. This statement has been altered in the FEIS.

SUMMARY COMMENT:

Bad weather (yes, it happens in winter) -- what happens to the people who get trapped at Old Faithful (OF)? Or 5-700 people arriving at one time at OF. OF doesn't have the facilities to handle this.

SUMMARY RESPONSE:

Bad weather occurs under current management. Emergency closures, while infrequent, also occur under current management. The same visitor management procedures would be implemented for emergency closures as are currently used.

COMMENT:

Page 12, -second table, Park Infrastructure and Operation, first row, Gasoline storage capacity: The comment refers to the limited amount of fuel storage in the interior of the Park. Alternatives B and G may not be valid alternatives because shuttles, snowplows, and snowcoaches would consume more fuel per mile than the current fleet of visitors. An effort would need to be made to ensure most of shuttles and/or snowcoaches enter the park with full fuel tanks.

RESPONSE:

Current mass transit systems operate under these circumstances. In order to implement various alternatives, some changes may need to be made -- including additional planning and preparation by those who operate the systems.

COMMENT:

No mention is made of the need for a snowmachine staging area at Madison. How are persons in West Yellowstone to get their machines there? Also, if there is no staging area, then machines which arrive from Norris Junction will be forced to return by the same route.

RESPONSE:

The comment is correct. The loss of visitor experiences under alternatives B and C are disclosed in the FEIS.

COMMENT:

Staging areas, especially at Madison Jct. For snowcoaches, will have to be quite large. Truck and trailer for towing a snowcoach are 40 feet. A van to transport 10 snowcoach passengers and gear is 20 feet. When our 7 snowcoaches all go to Canyon, we will need 420 feet of parking plus a loading and unloading area. I am concerned about this necessary space to support just Alpen Guides at status quo... parking for waiting vans and buses. Piling plowed snow here will become more of a problem as winter progresses.

SUMMARY RESPONSE:

The NPS agrees that parking and staging at Madison Junction will be limited. This limitation will have a corresponding adverse effect on visitor experience by possibly limiting the number of visitors who can travel north via over-snow vehicles from the west. Over-snow travel by snowcoach would not be limited from south. The effect of this proposal on visitor experience has been disclosed in the FEIS.

SUMMARY COMMENT:

You did not address the obvious issues such as the antiquated sewer systems, gas stations leaking fuel nor the limited storage for gas, day use facilities, sewage treatment, medical and police services, emergency, accident response, delivery services and garbage hauling. Reference page 296.

VISITOR ACCESS AND CIRCULATION

SUMMARY RESPONSE:

All of these issues are not in all the alternatives, including alternative A – no action. They are not entirely winter use issues. Some issues are addressed by alternatives where the intent is to make visitation and access safer than under current management. Plowed road access between West Yellowstone and Old Faithful addresses problem areas such as gasoline and solid waste storage at the destination site. This is indicated in the EIS.

SUMMARY COMMENT:

I am also concerned on the impact a snowmobile staging area at Old Faithful would cause.

SUMMARY RESPONSE:

The need for staging at Old Faithful would be no greater under any alternative than the existing condition. The intent in alternatives B and C is to provide wheeled vehicle access to the park's interior from West Yellowstone, not to create a snowmobile staging area for access into the rest of the park. Unlimited snowmobile hauling from West Yellowstone would not be allowed.

SUMMARY COMMENT:

I truly anticipate snow machine rentals within YNP at the new Lodge at Old Faithful. Are we going to let this happen?

SUMMARY RESPONSE:

Limited rentals could be possible. Depending on how the decision is made: should alternative B or C be selected, interim caps on snowmobile use in the park could be anticipated.

SUMMARY COMMENT:

I don't think you have the infrastructure, such as warming huts and rest areas, to increase nonmotorized use of the park significantly. You eliminate the pleasures of touring at one's own pace.

SUMMARY RESPONSE:

Some alternatives provide for the construction of additional winter use facilities for these purposes. See the alternative descriptions.

SUMMARY COMMENT:

If YNP cannot improve the infrastructure as they claim, how can they, in good faith, propose to increase users (sic) days, which in turn creates more demand for better facilities?

SUMMARY RESPONSE:

There is no proposal specifically to increase user-days. There is also no indication that YNP cannot improve the infrastructure. The point is made in the EIS that infrastructure is not related directly to winter use and that any new infrastructure must proceed through a thoughtful, deliberated, planning process. See Scope of Analysis in EIS Chapter 1.

VISITOR EXPERIENCE

COMMENT:

There are existing, less expensive, or even free, alternatives. For example, visitors can choose any border trailhead or boundary to enter the park via snowshoe or cross-country skis.

RESPONSE:

The comment is correct that some visitors can access the parks via their own power. However, assuming that because citizens can visit the park that the NPS has provided equitable access is a flawed argument. Possessing the knowledge, equipment and fitness level to ski long distances into parks eliminates a large portion of visitors from participating in this activity. All citizens pay for Park operations and maintenance including road grooming operations. A review of the costs of the alternative alternatives in Appendix F shows that these costs are not insubstantial. The current winter visitor to the parks represents a small and heterogeneous portion of our diverse national population. It is not an unreasonable goal for the NPS to strive to provide access to popular destination areas of the parks at a rate, which is not cost prohibitive for most citizens.

COMMENT:

The decision to allow snowmobiles into Yellowstone National Park "[M. Yochim, Annals of Wyoming, 1998]—Even though oversnow, mass transit has been an available choice in Yellowstone for 45 years, the oversnow transportation of choice is an individual snowmobile by a factor of about 9 to 1.

RESPONSE:

The NPS agrees that snowmobiles are a popular form of transportation for some park visitors. The effects of the range of alternatives on the experiences of those who prefer to ride snowmobiles are discussed in the DEIS (see Chapter IV). The comment is referred to the discussion of the desired condition (this discussion will be expanded in the FEIS) on page 2 of the DEIS. The desired condition describes the other criteria for winter park management, which are important to NPS decision makers.

COMMENT:

Visitor experience data provided in the DEIS is more heavily weighted toward the snowmobile enthusiast than other users.

RESPONSE:

As stated in the DEIS on page 173, information is not readily available concerning potential visitors who may not currently come to the parks. One of the gaps in information acknowledged in the DEIS is that many persons may not be coming to the parks because the experience they are seeking is not currently available. In an effort to fill these information gaps the NPS conducted two additional surveys in the summer of 1999: a survey of summer visitors and a regional and national telephone survey. The data collected from these surveys will be added to the discussion of visitor experience in the FEIS.

COMMENT:

More specific data from these surveys should be included in tables--numbers and percentages, of visitors in the various use categories, breakdown of preferences, values, satisfaction, etc. by user category.

RESPONSE:

The NPS will review and clarify the discussion of user surveys in the FEIS.

COMMENT:

Did the visitors that stayed more than one day stay in the parks or did they stay in facilities in the parks plus facilities in communities outside the parks? Clarify.

RESPONSE:

The majority of visitors that remain overnight spend the night in a hotel or motel outside YNP. Twelve percent of visitors spend at least one night in the park (Borrie et al. 1999). This discussion will be reviewed and clarification made if necessary in the FEIS.

VISITOR EXPERIENCE

COMMENT:

Surely the "resource" of Yellowstone is more than its rocks, forests, hot spring features--it is also mood, authenticity, "contrast qualities," its overall "differentness."

RESPONSE:

The NPS agrees. However these types of park values because they are experiential in nature are very difficult to define, particularly for a diverse world population. The discussion of visitor experience in Chapters III and IV looks at the experiential values park visitors find most important on a very broad level. The adaptive management and monitoring provisions, under some alternatives, propose indicators and standards for visitor experience. These standards are the first step in establishing thresholds for protecting these "contrasting qualities".

COMMENT:

The Grand Loop tourism experience is important and must be maintained.

RESPONSE:

Partly in response to the overall non-support of plowing the road, NPS expresses a new preferred alternative in the Final EIS. This alternative would provide oversnow-motorized access from West Yellowstone to Old Faithful, and allow visitors to experience the Grand Loop by snowcoach.

COMMENT:

The DEIS has not accurately or sufficiently considered the impact of this alternative [B] on visitor expectation and experience.

RESPONSE:

The DEIS has adequately disclosed the impacts of all alternatives on visitor expectations. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate. An EIS is not, per se, a scientific document. CEO regulations (40 CFR §1502.22) allow the use of the best available information and techniques to support an analysis where data is incomplete or unavailable. It is NPS' impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. This comment has no effect on the range of alternatives evaluated in the EIS and the range of features available as choices for the decision maker. The impacts of alternative B on visitor opportunities access and experience are accurately disclosed in the DEIS and the FEIS. The impacts of alternative B on the surrounding communities will be further clarified in the FEIS.

COMMENT:

The DEIS has not accurately or sufficiently considered the impact of this alternative (alternative B) on surrounding communities, visitor expectation and experience, wildlife, and the resource.

RESPONSE:

The DEIS has adequately disclosed the impacts of all alternatives on surrounding communities, visitor expectations, wildlife and other park values and resources. In performing this assessment, NPS has used available and credible literature and has cited it where appropriate. An EIS is not, per se, a scientific document. CEO regulations (40 CFR §1502.22) allow the use of the best available information and techniques to support an analysis where data is incomplete or unavailable. It is NPS' impression that what is meant by this comment is that there is disagreement on the preferred alternative, and the rationale used for its preference. Once again, this comment has no effect on the range of alternatives evaluated in the EIS and the range of features available as choices for the decision maker. The impacts of alternative B on visitor opportunities access and experience are accurately disclosed in the DEIS and the FEIS. The impacts of alternative B on the surrounding communities will be further clarified in the FEIS.

COMMENT:

The impact analysis fails to adequately address the opportunity cost of the loss of wildlife viewing from snowmobiles accessing the Park from West Yellowstone.

VISITOR EXPERIENCE

RESPONSE:

The discussion regarding wildlife viewing from snowmobiles will be reviewed and clarified in the FEIS if necessary.

COMMENT:

I also do not see an adequate reference in the analysis of alternative B of the park visitor experience riding buses or vans.

RESPONSE:

The commenter is referred to the discussion on page 219-221 of the DEIS. This discussion will be reviewed and clarified in the FEIS if necessary.

COMMENT:

The DEIS fails to comprehensively evaluate the impacts of snowmobile use on nonmotorized users.

RESPONSE:

The commenter is referred to the analysis presented on pages 222. The analysis focuses on the opportunities to experience important park values for all types of visitors because it is unreasonable to assume that opportunities for solitude, quiet, wildlife viewing, clean air and scenery are important to only one user group. The analysis of the natural soundscape specifically looks at the impact of snowmobile sound on nonmotorized users, primarily because these visitors are the ones that can access large areas of the backcountry and are affected by the sound of motorized vehicles.

SUMMARY COMMENT:

Plowing the road would make viewing the park impossible from the bus. I don't believe some of the impacts of your suggested plan have taken into consideration the viewing restrictions due to the walls of snow along the route to the geyser.

SUMMARY RESPONSE:

The commenter is referred to the disclosure of effects of snow plowing on pages 219-222 of the DEIS. The NPS believes that the effects of snow berms on opportunities for viewing scenery have been accurately disclosed in the DEIS and the FEIS.

COMMENT:

"Snowcoach only thinking" restricts before adequately assessing real impacts or other legitimate alternatives that allow greater access.

RESPONSE:

Alternative G, one of seven alternatives presented in the EIS, proposes snowcoach only travel. It is the purpose of the EIS to examine a reasonable range of alternatives to the proposed action. Other alternatives suggest increasing motorized opportunities in the parks. It is unclear why the commenter is concerned that a decision has been made at this stage of the NEPA process.

COMMENT:

Alternative B has several major negative impacts to visitor experience. The first and foremost is plowing the road from West Yellowstone to Madison to Old Faithful. Alternative B eliminates the Grand Loop experience for all winter visitors. The Grand Loop is an effective transportation system for dispersing visitors. The elimination of the loop will also cause greater congestion at popular attractions. The EIS must analyze in further detail the effects of greater congestion at these attractions.

RESPONSE:

Data from park surveys indicates that less than 10% of all winter visitors travel the entire grand loop. Currently 76% of all winter visitors travel to Old Faithful and 48% travel to Canyon. With regard to these statistics separating the park into different transportation zones may indeed reduce crowding at attraction sites under alternative B and C. A discussion of the potential for alternatives B and C to increase crowding at attraction sites will be added to the FEIS.

VISITOR EXPERIENCE

COMMENT:

An increase of use will require more frequent grooming of the trails, or trail conditions will deteriorate. The Final EIS must analyze the impacts that these deteriorated trail conditions will have on the winter visitor experience

RESPONSE:

The commenter is correct. Please see the disclosure of effects under alternatives B and C on pages 219-222 and 240-242.

COMMENT:

Your analysis regarding visitor experience under alternative B gives short shrift to the 1996 Littlejohn survey results listed on page 184, and the 1999 survey (p.233) where visitor respondents reported "overall support for continued mechanized winter access to YNP." Preferences for car access, affordability and plowed roads were not mentioned in this survey.

RESPONSE:

Visitor experience and access is only one issue to be considered by the decision maker. The effects of visitor use on the resources and values of the parks are of great importance. The commenter is referred to the discussion of the desired condition on page 3 of the DEIS. Using the data from the two above-mentioned surveys the effects of the range of alternatives on visitor experience were accurately disclosed in the DEIS. The commenter is referred to page 221 where major adverse impacts (under alternatives B and C) on the experiences of snowmobilers and snowcoach riders are disclosed. Partly in response to the overall non-support of plowing the road, NPS expresses a new preferred alternative in the Final EIS. This alternative would provide over-snow-motorized access from West Yellowstone to Old Faithful, and allow visitors to experience the Grand Loop by snowcoach.

COMMENT:

The impacts [of plowing] haven't been integrated with the management of the parks' resources in terms of quality visitation.

RESPONSE:

The effects of providing visitor access to YNP via a plowed road on visitor experience have been accurately disclosed in the DEIS and FEIS. The commenter is correct that road plowing may have negative effects, particularly for those visitors who wish to see the entire park via one mode of transport. All alternatives in the DEIS meet the purpose and need for action to a greater or lesser degree. It is unrealistic to expect all alternatives in an EIS to meet all desired conditions expressed in the purpose and need for action equally well. Such a set of alternatives would likely have no significant differences among them.

COMMENT:

My principal concern with ALL the alternatives as written is that they do not adequately address access by the disabled that may have an impact on the environment and would have an impact on visitor experience.

RESPONSE:

All alternatives allow for equal access to major destination areas within the parks. In all alternatives the most physically restrictive form of over-snow access, the snowmobile. Whenever snowmobiling occurs this type of access is accompanied by the more accessible snowcoach (except for the East Entrance road). The commenter is correct that access to all facilities is currently not available in the parks in the winter. The goal of the NPS is to provide accessible facilities year round. A discussion on the availability of accessible winter facilities and activities in the parks will be added to the FEIS.

COMMENT:

Within the DEIS, great care is taken to prove on paper that access by wheeled vehicles will actually increase the number of visitors to the Park in winter. What the document fails to examine is whether or not people will actually visit Yellowstone in winter if snowmobiling the lower loop is no longer available to them. Unlike some who seem to have been persuaded that the 'field of dreams' approach will work, the town does not believe for one moment that "If you plow it, they will come."

VISITOR EXPERIENCE

RESPONSE:

The comment misunderstands the analysis presented in the DEIS. Nowhere does the analysis indicate that plowing the road will increase visitation. The analysis under socioeconomics estimates that under alternatives B and C that use may decrease (see pages 201-202 of the DEIS). The discussion presented under visitor access for alternative B looks at physical capacity limits- not at actual visitor use numbers. This discussion will be clarified in the FEIS.

COMMENT:

A shuttle bus system has been suggested, but is this to be a true bus system, or a glorified tour bus?

RESPONSE:

Under alternative B the proposal for a mass transit shuttle bus system will be clarified. Just as under current management a variety of options would be available to park visitors.

COMMENT:

At one point this paragraph state: "indicate that sections of the park must be closed or certain uses restricted to protect these values." This is followed by: "all visitor experiences currently afforded in the areas of closure would be eliminated." These statements are not in agreement. Clarify.

RESPONSE:

Certain park values like wildlife or geothermal areas may be adversely impacted by human activities or access. Areas of the parks may be closed to human use if that use is shown to impair park resources. If an area were closed to human access it is an accurate assessment that visitor experiences would be eliminated in that area, however the resource being affected by that use would be protected. The statements are in agreement. This discussion will be further clarified in the FEIS.

COMMENT:

Would snow piled up spoil any viewing via snowcoach?

RESPONSE:

Just as under current conditions, the snow berms created by road grooming, under all alternatives, are expected to be minimal.

SUMMARY COMMENT:

The DEIS fails to show how greater opportunities for recreation will be provided. There are no snowcoach staging facilities at Norris, and most importantly, no capability to refuel snowcoaches at Norris. The stated reason for closing this segment to snowmobile use is to "provide opportunities to ski or snowshoe in a quiet environment". [Vol.I,page31] yet there is no proposal in the alternative to add ski areas beyond what already exists at Canyon or Virginia Cascades. There is also no logical destination for a snowcoach traveling the 13 miles from Norris to Canyon other than to go there and return. There are no lodging or dining opportunities at Canyon, so there is extremely small incentive to take a coach there from Norris. Likewise, since there is virtually no coach traffic from the east entrance, and since it is 58 miles one-way from the south entrance to Canyon, it is doubtful converting this road segment to mass transit only will really be of much benefit to late season recreation opportunities.

VISITOR EXPERIENCE

SUMMARY RESPONSE:

A NEPA document is intended to be a tool for better decision-making, not a justification for a particular alternative or set of alternative features. Therefore, within the range of the alternatives, various components will necessarily meet the stated desired condition with varying degrees of success. The commenter is correct by pointing out that an alternative should be feasible. The second most visited destination (Old Faithful is number 1) in Yellowstone is the Grand Canyon of the Yellowstone located just to the east of Canyon Village (Littlejohn 1996). Although there is no gas station at Norris there is one at Canyon Village and at Fishing Bridge so that snowcoaches can refuel at either of these destinations. As stated in the DEIS (page 239) 120 parking spaces are available at Norris Junction. Under this alternative skiing is unrestricted, except for safety reasons, within the canyon itself. The greater opportunities are provided through the opportunity to ski in a quiet clean quiet environment. The commenter is correct in that several of the actions proposed in alternative C present logistical problems that might affect visitor experience. An analysis of these effects can be found on pages 240-242 of the DEIS.

COMMENT:

Visitor experience data provided in the DEIS is more heavily weighted toward the snowmobile enthusiast than other users. This is understandable given the present day use of the Parks. However, is this a valid survey and should it carry as much weight as the other seven major issues? Since the DEIS was in response to a suit brought against the Park Service because of trail grooming in winter, and the fact that the majority of respondents to surveys you cited were users of the groomed trails, it appears that the survey results are not appropriate in determining winter use as are air quality, noise, natural resources, and human health and safety. Have additional surveys been conducted to a wider audience more recently than those cited in the DEIS? Having stated this position, we find that the visitor experience revealed interesting results. "YNP visitors reported gaps between importance of several characteristics of their visit and the degree of satisfaction with the experience for that characteristic." The characteristics showing the largest gap are tranquility, peace and quiet, and getting away from crowds.

RESPONSE:

As stated in the DEIS on page 175 information is not readily available concerning potential visitors who may not currently come to the parks. One of the gaps in information acknowledged in the DEIS is that many persons may not be coming to the parks because the experience they are seeking is not currently available. In an effort to fill these information gaps the NPS conducted two additional surveys in the summer of 1999; a survey of summer visitors and a regional and national telephone survey. The data collected from these surveys will be added to the discussion of visitor experience in the FEIS. Determinants of winter use, or how various impact topics or effects may be weighted, will fall to the decision maker and the rationale for the eventual decision.

COMMENT:

This should also state that there would be fewer opportunities due to the closure of Jackson Lake to snowmobiles after 5 years.

RESPONSE:

A reference to the loss of snowmobiling opportunity on Jackson Lake may be found on page 223. A reference to the loss (after a 5 year period) of this opportunity will be added to the discussion of access to winter activities in the FEIS.

COMMENT:

The specific activity group that would be adversely affected should be identified --- snowmobilers.

RESPONSE:

The activity groups that would be adversely affected by plowing the road from West Entrance to Old Faithful have been correctly identified in the DEIS (page 221) as those who ride snowmachines. Snowcoach riders would also be denied the opportunity to access Old Faithful via this entrance.

COMMENT:

The document states that on page 236 that unregulated backcountry nonmotorized use would have a moderate negative and short-term impact. Clarify the basis for making this assumption.

VISITOR EXPERIENCE

RESPONSE:

This statement on page 236 refers to a negligible short-term impact. The rationale for this conclusion is based on the inactivity of grizzly bears during the winter season. If bears should remain active areas can be closed to human use to prevent human bear conflict. Therefore the chance that an adverse effect on grizzly bears would occur as a result of the actions presented in alternative C is low or negligible.

COMMENT:

It is not true that wildlife viewing opportunities would be the same as for alternative A, since all backcountry use is prohibited in alternative F. This also applies to the same statement under Opportunities to view Scenery, 2nd sentence on page 285.

RESPONSE:

The comment is correct. The conclusions concerning unregulated backcountry use in alternative F (on page 285 of the DEIS) will be edited to reflect this correction.

SUMMARY COMMENT:

The NPS should be looking for more ways to provide nonmotorized travel away from main motorized routes. Furthermore, plowing the West Yellowstone to Madison Jct. to Old Faithful road eliminates Idaho's own version of the "Grand Loop". The ability to originate in Idaho and loop through the John D. Rockefeller, Jr. Memorial Parkway and Yellowstone National Park is contingent on these trails. The 1994-5 Idaho Winter Sports and Recreation survey by the University of Idaho indicates that looping trail systems add to the quality of experience for 88% of the snowmobiling public.

SUMMARY RESPONSE:

The NPS appreciates that nonmotorized opportunities should be separated from motorized activities. Alternatives B and C look at various areas where these opportunities could be provided. However, for several reasons, separating these two user groups is problematic. First much of the backcountry of the parks is recommended as wilderness which removes the possibility of mechanized trail grooming. Second, because of the extreme winter environment and difficult travel backcountry skiing in the parks is certainly not for everyone. Third, because skiing in the interior of the park requires that the trailhead be accessed by oversnow vehicle, separating the two uses in a meaningful way is difficult. Discussion of "Idaho's own Grand Loop experience" will be added to the adjacent lands section in the FEIS.

SUMMARY COMMENT:

Snowmobiles negatively affect the visitor experience because they are noisy, have an odor and pollute the air. Depending on a number of factors including topography, vegetation, wind direction a nonmotorized user who wants to truly experience natural quiet may need to move several miles from snowmobile routes before the sound of snowmobiles is no longer discernable.

SUMMARY RESPONSE:

The effects of snowmobiles (sound, odor, and air quality) on the visitor experience are analyzed in chapter IV of the DEIS. The analysis for each of these individual impact topics will be refined in the FEIS.

SUMMARY COMMENT:

The use of multi-purpose passenger transportation systems would be less disruptive to the ecosystem and the winter park experiences. Mass transit will enhance the opportunities to appreciate solitude and quiet.

SUMMARY RESPONSE:

The effects of mass transit are disclosed on in chapter IV of the EIS.

VISITOR EXPERIENCE

SUMMARY COMMENT:

We are opposed to the phase-out restriction of snowmobiles to Jackson Lake (or the elimination of snow planes). We feel this will unjustly limit recreational fishing use of the lake during the winter.

SUMMARY RESPONSE:

This comment refers to a feature of an alternative that the commenter feels is unfair. In general, the tenor of expressions of support and opposition appear to relate to the decision that the commenter would like to see NPS make. The commenter's comments will be considered in making the final decision, but there is nothing in those comments that substantively would alter the range of alternative features to be evaluated in the final EIS. For example, if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter agrees with. If only the actions that are supported by the comments remain, then there is effectively only one alternative. From the NEPA standpoint, the analysis cannot be limited in this fashion. Therefore, expressions of support or objection will not be responded to, in general, by changes in alternative features – they will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. There is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.

SUMMARY COMMENT:

Plowing the road would result in high berms of snow and obstruct the view of much of the scenery. Visitors would experience a more developed atmosphere. We do not support plowing any additional roads for wintertime access within YNP, and in particular do not support plowing the road from West Yellowstone to Old Faithful as this would destroy the Grand Loop experience for all winter visitors and also eliminate access to important services which winter snowmobile and snowcoach visitors need, and which, to a great degree, are only available within the gateway community of West Yellowstone.

SUMMARY RESPONSE:

The effects of road plowing and the elimination of the grand loop oversnow experience on the experience of visitors have been disclosed in the DEIS and the FEIS.

SUMMARY COMMENT:

Trail grooming has resulted in considerable adverse impact to cross-country skiers and snowshoers.

SUMMARY RESPONSE:

The effects of trail grooming on the experience of visitors have been updated and disclosed in the FEIS.

SUMMARY COMMENT:

The snowcoach experience involves traveling as a group, which includes noise and disruption of a different but important magnitude. Noise pollution includes being around other people. Visitors lose important independence and freedom impacting their unique experience when traveling in the confines of snowcoaches and groups. A snowcoach dictates where you're going to stop and where you can't stop and take a picture of an animal if you want to, without disturbing the animal.

SUMMARY RESPONSE:

The effects of traveling by snowcoach on the experience of park visitors have been disclosed in the EIS.

SUMMARY COMMENT:

The entire enjoyment of a trip through the park is to be able to stop where and when you want, an option that won't be available on a tour bus. I cannot imagine that a tourist bus traveling down a snowy road, trapped between massive snow embankments, peering through fogged up windows, can be a positive personal winter experience.

VISITOR EXPERIENCE

SUMMARY RESPONSE:

The effects of traveling by mass transit on the experience of park visitors have been disclosed in the EIS.

SUMMARY COMMENT:

Reducing the area available for snowmobilers will not enhance the experience for any group. Snowmobilers will be denied the opportunity to enjoy the majority of the features of the park and nonmotorized visitors will be less inclined to visit "snowmobile" areas. This denies both visitor groups full enjoyment of the park. Replacing snowmobile trails with tour buses or vans would end the most popular Yellowstone winter experience for all of us for all time.

SUMMARY RESPONSE:

The effects of traveling by mass transit on the experience of park visitors have been disclosed in the EIS.

SUMMARY COMMENT:

Maximizing winter visitor opportunities will generate more visitors as well as compromising the quality of the experience. I have often visited the park in both seasons and find the quality of the experience greatly diminished with excessive crowds. When I was in Yellowstone, I got stuck in a traffic jam, I saw throngs of tourists harassing wildlife, I saw overused trails, and I was able to experience very little of the solitude and quiet that I had come for.

SUMMARY RESPONSE:

The effects of alternative C on the experience of park visitors have been disclosed in the EIS.

SUMMARY COMMENT:

Many of us would use the park more in winter if the snowmobile traffic was cut back and those numbers would increase dramatically if snowmobiles were banned completely.

SUMMARY RESPONSE:

The effects of alternative G on the experiences of visitors are disclosed in the EIS.

SUMMARY COMMENT:

Limiting nonmotorized use to trails would have a negative impact on historic uses of the Park by visitors that are responsible and sensitive to wildlife issues.

SUMMARY RESPONSE:

The effects of implementing trail restrictions on the experience of park visitors have been disclosed in the EIS.

SUMMARY COMMENT:

Manage the Park responsibly so that as many winter users as practical can enjoy the splendor and uniqueness of this national treasure. As the population moves toward more "virtual" experiences created by computers, I feel it is important that there are still "real" experiences to be had in life. One of these "real" experiences is snowmobiling in Yellowstone National Park. By snowmobile, a person is able to stop along the roadside whenever they want, to observe swans, or elk feeding on moss in the river, or the many geysers and bubbling pots. Winter recreation, especially snowmobiling, is an important activity to both Park visitors.

SUMMARY RESPONSE:

The NPS appreciates your comment. The effects of limiting snowmobile travel in the parks is disclosed in the EIS.

SUMMARY COMMENT:

Plow the roads. The visitor experience will be greatly enhanced, more accessible, and more affordable. The proposal of snowcoach travel allows visitors to see the natural beauty and sights without the added air and noise pollution from the thousands of snowmobiles. Snowcoaches—this greatly benefits the visitor in a few ways; they have a more enjoyable and personalized visit, as well it provides a great interpretive opportunity.

VISITOR EXPERIENCE

SUMMARY RESPONSE:

The effects of road plowing on the experiences of visitors have been disclosed in the DEIS and the FEIS.

SUMMARY COMMENTS:

The use of multi-passenger transportation systems would be less disruptive to the ecosystem and the winter park experience. The plan (G) will enhance opportunities to appreciate quiet and solitude in the parks along with clean air. Forcing all visitors to take public transportation will also effectively force them to be educated about the park (and benefits of mass transit).

Limiting motorized recreation would eventually permit year-round public access to the Parks year-round with far less impact on the environment.

SUMMARY RESPONSE:

The effects of traveling by mass transit on the experience of park visitors have been disclosed in the EIS.

SUMMARY COMMENT:

By phasing out snowmobile use in Yellowstone and Grand Teton, visitors will be able to enjoy the natural beauty of the park. Banning snowmobiles will enhance the wintertime experience of visitors to the parks.

SUMMARY RESPONSE:

The effects of limiting snowmobile travel in the parks is disclosed in the EIS.

SUMMARY COMMENT:

Snowmobiles do not cause damage to visitor enjoyment. The snowmobile is really one of the best ways to get people into the Park so people can see it.

SUMMARY RESPONSE:

The effects of snowmobiling on the experiences of park visitors are disclosed in the EIS.

COMMENT:

I see no data on the use levels that now occur on the already plowed Mammoth to Cook City Highway.

RESPONSE:

The commenter is referred to page 145 of the DEIS.

COMMENT:

Do you have any data to prove that visitor numbers would not decline?

RESPONSE:

In order to analyze how visitors might use the parks under the range of alternatives presented in the EIS three visitor surveys were conducted in 1998/1999. One survey conducted during the winter season of 1998-1999 included respondents who were visiting the three park units and the surrounding national forests. Two other surveys targeted summer visitors to YNP and the U.S. population as whole, as well as local and regional residents. The survey information presented in the DEIS reflects the only the winter survey data because the summer and national surveys were not yet completed. The new survey information will be added to the analysis presented in the FEIS. There is no way to prove that visitor numbers will or will not decline under a given alternative nor is it an objective or requirement of a NEPA document to do so (40 CFR 1502.24). The NPS believes that these surveys represent the best and most reliable available data on how winter visitor use might change under each alternative. The commenter is referred specifically to the analysis presented under socioeconomics and visitor experience.

VISITOR EXPERIENCE

COMMENT:

It should be pointed out that, aside from this past March -- I went and checked the numbers -- snowmobile visitation figures last winter were barely up from a year before.

RESPONSE:

This information will be updated for the 1999-2000 winter use season in the FEIS. The commenter is referred to the winter visitor use data presented in the DEIS on pages 143-149.

COMMENT:

Furthermore, though not disclosed in the Draft EIS, the NPS has never finalized a proposed rule to officially designate the CDST as a snowmobile route in GTNP and the Parkway. Instead, the NPS has relied on illegal annual decision to authorize use of the CDST on an experimental basis. For these reasons, the CDST is currently not a legal snowmobile route in GTNP or the Parkway and, therefore, must be closed until the NPS finalizes a rule officially designated the CDST as open to snowmobile use. The NPS must provide a discussion of the history and status of the CDST in a supplement or Final EIS.

RESPONSE:

A discussion of the history and status of the CDST will be added to the FEIS.

COMMENT:

Most of the surveys referenced here were of park visitors, while one included an opportunistic survey of visitors on adjacent national forests. Consequently, these surveys provide a woefully incomplete reflection of how the national or even the regional public feels about visitor use of these two national parks. (The DEIS, p.90, mentions there is at least one incomplete survey that targets people outside park boundaries). It should be acknowledged that the current surveys are generally heavily biased by their focus on existing winter and snowmobiling visitors. Obviously, if a survey is limited to park visitors, and 60% of those visitors snowmobile in the park, results are going to be heavily weighted to that snowmobiling viewpoint, particularly on questions about whether snowmobiles should be eliminated. The surveys ignore the people who are no longer visiting the parks, perhaps because of negative impressions and experiences. A variety of these dissatisfied winter visitors testified at the DEIS public hearings. See also, for example, the Teton County, Wyoming, survey, noted below, where a greater percentage of non-visitors felt snowmobiles had a negative impact on the park than visitors. We have attempted to highlight some of the survey findings, keeping this bias in mind. The NPS should conduct a national survey on public perspectives regarding snowmobile use in Yellowstone, Grand Teton, and John D. Rockefeller Parks. Such a survey should include persons who visit the Parks during other seasons and the broader public, which does not, or is not able to visit the Parks.

RESPONSE:

This comment repeats concerns regarding the visitor surveys that were identified in the DEIS on page 175. For that reason two additional surveys were conducted during the summer of 1999. The surveys targeted summer visitors to YNP and the U.S. population as whole, as well as local and regional residents. The new data will be added to the FEIS. In addition, information provided by Teton County, Wyoming will be added to the FEIS.

COMMENT:

If NPS managers want to create some new visitation regime then scientific evidence of specific and important environmental impacts resulting from the existing transportation system are needed.

RESPONSE:

The commenter is referred to the discussion of effects for alternative A in Chapter IV of the DEIS. An EIS is not, per se, a scientific analysis. It is intended to disclose environmental effects over a range of alternatives in which the analyses must demonstrate scientific integrity by disclosing methods and making explicit references to sources used (40 CFR 1502.24). The DEIS does this. CEQ regulations also allow for incomplete or unavailable information, by describing procedures that are to be followed in these instances (1502.22). Any identified gaps in the FEIS will follow the requisite procedures.

VISITOR EXPERIENCE**COMMENT:**

We fail to see how this mid-season road plowing will provide a greater range of winter recreation opportunities and the DEIS fails to outline what expanded opportunities will be created. If implemented, it will result in the loss of one to two weeks of recreation access in the northern half of YNP during the time the road is being converted to plowed status. Additionally, after the road is converted to plowed status, there will be a number of days when access is lost due to severe weather conditions (heavy snowfall, high winds, drifting) forcing a road closure, as compared to this access more likely being continuous if the segment remains an oversnow route.

RESPONSE:

Alternative C proposes to plow the road from Mammoth to Madison two weeks earlier than under alternative A, no-action. The expanded opportunities offered refer to the ability to recreate via oversnow travel without the presence of snowmobile odor and sound. The analysis of this alternative indicates that it would be logistically difficult to implement. All alternatives in the DEIS meet the purpose and need for action to a greater or lesser degree. In our estimation it is unrealistic to expect all alternatives in an EIS to meet all desired conditions expressed in the purpose and need section equally well.

COMMENT:

The plowing of the road at mid-season will result in the loss of one month of motorized oversnow experience in the northern half of YNP and result in the lost ability to travel, by an oversnow recreational transportation mode, to Old Faithful from anywhere but the south and east entrances.

RESPONSE:

This effect will be noted in the analysis of visitor experience under alternative C in the FEIS.

COMMENT:

The Teton County Public Opinion Survey provides some indication of the dissatisfaction among residents with the heavy snowmobile emphasis in Yellowstone National Park, and the split among local visitors and non-visitors. While only about 14% of the respondents who had not visited Yellowstone in the last year mentioned that one of the things they liked about the park was snowmobiling, more than one in three mentioned something they did not like which was associated with snowmobiling, including snowmobiling itself, snowmobile traffic, snowmobile noise, snowmobile air pollution and crowding. Even for those who had visited Yellowstone National Park in the last year, more respondents mentioned disliking something about snowmobiling than mentioned liking snowmobiling (44% vs. 38%). The results for Grand Teton National Park are even less supportive of snowmobiling. Less than 4% of people who had not visited Grand Teton in the last year specifically mentioned liking snowmobiling, compared to about 10% of park visitors. According to a 1998-9 winter visitor survey, while there is support for continued mechanized winter access to Yellowstone, there is less support among residents than nonresidents: Less than 60% of park visitors from the GYE support continued mechanized access. This suggests that residents may feel less tolerant of the use of the parks as a snowmobile playground, particularly if they have visited Yellowstone. As the DEIS notes on p.91, the 1999 winter visitor survey showed that 39% of in-region winter visitors favor either ski, and snowshoe only, or ski, snowshoe and snowcoach access. Although visitors said that the desire for tranquility, solitude, peace and quiet, and to get away from crowds are all relatively very important with respect to their visit to Yellowstone, they also said that they were fairly dissatisfied what the park offered in these areas. "A 1996 survey found that visitors placed similar importance on quiet and solitude: 69% said quiet was extremely or very important; 67% said solitude was extremely or very important. These objectives are not being met under current uses with the predominance of loud, polluting snowmachines.

RESPONSE:

A discussion of the Teton County Public Opinion Survey will be added to the FEIS.

COMMENT:

What baseline is used to measure use trends? Has there been any percentage change for each recreational category (i.e., skiing, snowshoe, auto, snowmobile)?

VISITOR EXPERIENCE

RESPONSE:

The use statistics for the last ten years are offered on pages 143-151 of the DEIS. They reveal that snowmobile use hit a high point in 1993 and 1994 and declined to 113,504 in 1996-1997. Winter use has risen incrementally since that year to a total of 127,397 in 1999-2000. How winter visitors might change their use patterns under each alternative was the central question posed by the three surveys conducted in 1998 and 1999. The data from these surveys will be included in the FEIS. Although winter use statistics are included in the DEIS there is no complimentary discussion of use trends. A discussion covering that topic will be added to the FEIS.

COMMENT:

It is important to note that historically it was Yellowstone National Park that encouraged the industry and surrounding communities to move in the direction of snowmobiles and snowcoaches because in their wisdom, it was determined at the time that plowing roads inside Yellowstone was neither practical or would it provide a quality visitor experience.

RESPONSE:

The decision not to plow the roads in YNP was made in 1967. Technology, not to mention road reconstruction has made plowing some segments of road a viable option. A discussion of the history of winter use in the parks will be added to Chapter I of the FEIS.

COMMENT:

It is not that they should be banned altogether, but there are plenty of places near the park that are snowmobile friendly why do they have to have unlimited access?

RESPONSE:

Currently snowmobiles are restricted to groomed road surfaces in the 3 park units. The range of alternatives includes the addition of motorized trails in alternative C and the closure of major sections of road in alternatives D and F. Alternative G eliminates snowmobile access into the 3 park units.

Comment:

One effect of the proposal to phase out snowmobiles from Jackson Lake that is not documented in the DEIS is the effects on mountaineering in the Teton range. Some mountaineers use snowmobiles to cross the lake, leaving the machines at the lake edge to access mountain terrain between Webb canyon and Moran canyon. This effect should be noted and evaluated.

RESPONSE:

This effect will be disclosed in the FEIS.

COMMENT:

Very much opposed to your decision that snowmobile use is not ORV use. I believe Yellowstone does fall within Executive Order 11644 and 11989.

RESPONSE:

The commenter is referred to page 3 of the DEIS. The NPS agrees that snowmobile use is ORV use. This will be further clarified in the FEIS.

COMMENT:

It is hard for most people to rationalize animal behavior impacts when profound impacts are being placed on their preferred mode of recreation in Wonderland. The Park managers owe snowmobilers a scientific explanation that they can understand. The current plan fails to do so.

VISITOR EXPERIENCE**RESPONSE:**

An EIS is not, per se, a scientific analysis. It is intended to disclose environmental effects over a range of alternatives in which the analyses must demonstrate scientific integrity by disclosing methods and making explicit references to sources used (40 CFR 1502.24). The DEIS does this. CEQ regulations also allow for incomplete or unavailable information, by describing procedures that are to be followed in these instances (1502.22). Any identified gaps in the FEIS will follow the requisite procedures. It is unclear from the comment what parts of the analysis are difficult to understand. Analysis of effects in air quality, sound, wildlife and visitor experience will be further clarified in the FEIS.

COMMENT:

The figures in this portion of the draft are misleading, confusing, poorly organized and appear to be inconsistent, but the point is that they are based on the winter visitor survey. We participated in that survey and we had no opportunity to think through this sort of analysis before we indicated what we would do if the road were plowed. We submit that a survey is not an adequate basis for an impact analysis.

RESPONSE:

The data from the winter visitor surveys will be reviewed and clarified if necessary in the FEIS. The winter visitor survey data presented in the FEIS will be supplemented by two additional surveys, one of summer visitors and a national and regional telephone survey. The protocols for survey distribution were based on generally agreed upon professional methods. Both the survey instrument and sampling techniques were reviewed by the NPS and by the cooperating agencies participating in this process. The NPS believes that the survey data presented in the EIS represents the best available information about how winter visitors might change their use of the parks under a given alternative.

COMMENT:

I also think that the analysis of impacts of nonmotorized use lacks a lot. There are references to how skiers effect (sic) wildlife but I see no mitigation other than keeping skiers on designated trails.

RESPONSE:

The alternatives presented in the DEIS includes a range of management actions which address the potential for adverse effects on wildlife caused by non motorized use in the parks. As the commenter notes alternative B suggests restricting nonmotorized use to designated trails. Alternative F suggests closing the backcountry of YNP to nonmotorized use entirely. Still other alternatives suggest using an adaptive management approach. Mitigation measures for mitigating impacts to wildlife will be added to the FEIS.

COMMENT:

The EIS was prepared without securing an accurate measurement of the opinion of the property owners within a reasonable radius of the Continental Snowmobile Trail System. No scientific opinion poll was conducted, so that the concerns of the public utilized in the preparation of the EIS do not have an accurate basis.

VISITOR EXPERIENCE

RESPONSE:

Public scoping was conducted in the summer of 1998 to define the issues and concerns addressed in the plan. In addition to mailing over 6000 scoping brochures, 12 local and regional public meetings were held. Two of the meeting locations, Jackson and Dubois, Wyoming are located in vicinity of the Continental Divide Snowmobile Trail. Once the DEIS was completed it was sent to over 4,000 interested parties for their review and comment. Seven hearings were also held to solicit public comment, one of these hearings occurred in Jackson, Wyoming. In all, over 46,500 letters (including this one) were received.

In order to assess how visitors might use the parks under the range of alternatives presented in the EIS, three visitor surveys were conducted in 1998/1999. One survey conducted during the winter season of 1998-1999 included respondents who were visiting the three park units and the surrounding national forests. Two other surveys targeted summer visitors to YNP and the U.S. population as whole, as well as local and regional residents. The survey information presented in the DEIS reflects the only the winter survey data because the summer and national surveys were not yet completed. The new survey information will be added to the analysis presented in the FEIS. There is no way to prove that visitor numbers will or will not decline under a given alternative nor is it an objective or requirement of a NEPA document to do so (40 CFR 1502.24). The NPS believes that these surveys represent the best and most reliable available data on how winter visitor use might change under each alternative. The commenter is referred specifically to the analysis presented under socioeconomics and visitor experience. The NPS disagrees with the commenter and maintains that the concerns of the public that have been identified throughout the EIS process are accurate and comprehensive.

COMMENT:

The introduction of alternative modes of transportation if levels of access are surpassed, and the outcome of no short-term effects on visitor access. All of this seems to be beneficial to the visitor but there is nothing about user conflicts and how those situations will be dealt with and I think this issue is quite important to the subject of visitor use. However, this alternative's big focus is splitting up the National Park for different winter sports. This will not be effective in fixing the problem of the snowmobile's colliding interests with other users. For example one side of the park is only designated for the skiers, however that part of the park is another 200 miles out of the way.

RESPONSE:

Each of the alternatives addresses the issue of visitor conflict differently. Alternatives B and C suggest adding new separate groomed trails for both nonmotorized and motorized users. Alternative C suggests that during the late season the road from Canyon to Norris would be used by only snowcoaches to provide an area of the park that would be free of the sound of snowmobiles. Alternative G eliminates snowmobiles and allows only snowcoach access to the parks. Access for skiers is not eliminated from any open entrance under any of the alternative. Several of the alternatives include additional safety and information programs to educate visitors about safe conduct and courteous behavior. The NPS agrees that this is an important issue and refers the commenter to the discussion of this issue on pages 11-15.

COMMENT:

As to lowering the costs over snowmobiles or coach rides, we question that. By the time a person prepares his/her vehicle with traction devices, anti-freeze, and mechanical updates, the cost will go above a coach or snowmobile trip. With increased snowmobile and other use, does the NPS have the money and manpower to keep vehicles and people where they are supposed to be?

VISITOR EXPERIENCE**RESPONSE:**

The two alternatives that address road plowing provide access in different ways. Alternative B provides access over a plowed road but by mass transit shuttle bus. Alternative C provides access over plowed roads via private vehicle. The NPS believes that the mass transit option would provide a more affordable option for accessing the parks in the winter. The NPS currently is charged with keeping both vehicles and people where they are supposed to be. Information on the costs of each of the alternatives is provided in Appendix E.

COMMENT:

The polluting and noisy snow machines that now travel the West Yellowstone/Old Faithful road will just transfer their polluting and noisy over-snow traverses to the north, east and south entrances.

RESPONSE:

The range of alternatives presented in the DEIS examines several different options for management of snowmobiles in the parks. Two of the alternatives suggest plowing the road from the West Entrance to Old Faithful. The commenter is correct that these alternatives, as written in the DEIS, provide no limits on the number of snowmobiles that can access the parks through other entrances. All alternatives contain the proposal to establish visitor carrying capacities, however until those studies are complete increased use in some areas of the parks is possible. The FEIS will contain mitigation strategies designed to address these concerns.

COMMENT:

What the document fails to examine is whether or not people will actually visit if snowmobiling the Lower Loop is no longer available to them.

RESPONSE:

In order to analyze how visitors might use the parks under the range of alternatives presented in the EIS three visitor surveys were conducted in 1998/1999. One survey conducted during the winter season of 1998-1999 included respondents who were visiting the three park units and the surrounding national forests. Two other surveys targeted summer visitors to YNP and the U.S. population as whole, as well as local and regional residents. The survey information presented in the DEIS reflects the only the winter survey data because the summer and national surveys were not yet completed. The new survey information will be added to the analysis presented in the FEIS. There is no way to prove that visitor numbers will or will not decline under a given alternative nor is it an objective or requirement of a NEPA document to do so (40 CFR 1502.24). The NPS believes that these surveys represent the best and most reliable available data on how winter visitor use might change under each alternative. The commenter is referred specifically to the analysis presented under socioeconomics and visitor experience.

COMMENT:

The additional charges levied by the Park Service policy for commercial vehicles would make the fees for riding these vehicles unattractive to all but a select few.

RESPONSE:

It is unclear what additional charges the commenter is referring to.

COMMENT:

I find it senseless that the NPS would consider banning snowmobiles on the lake, but will allow snowplanes. Have you ever been there to listen to how much noise they make?

RESPONSE:

The effect of snowplanes on the natural soundscape is an analysis topic that was included in the DEIS and will be further clarified in the FEIS. The preferred alternative for GTNP will be changed in the FEIS to suggest that all oversnow-motorized access to Jackson Lake be eliminated.

VISITOR EXPERIENCE

COMMENT:

You state crowding at Old Faithful will busloads and cars reduce this?

RESPONSE:

The analysis presented for alternative B indicates that the physical capacity Old Faithful will accommodate use levels that occur today. Under alternative C, because of the proposal to provide access via private vehicle (and not mass transit) the physical capacity is greatly reduced. The commenter is referred to the analysis of visitor access for all alternatives in Chapter IV of the EIS. The discussion of physical capacities will be clarified in the FEIS.

COMMENT:

The conclusion to the analysis for alternative B includes the following statement: "The adaptive management provisions of this alternative require that if monitoring or scientific studies regarding winter visitor use, natural resources and other park values indicate that sections of the park must be closed or certain uses restricted to protect these values, all visitor experiences currently afforded in the area of closure would be eliminated. These areas of closure would result in direct adverse impacts to desired winter visitor experience." This description of adaptive management appears to be set-up for the eventual closure of the West Yellowstone entrance to all visitor use and the possibility of implementing that change without the benefit of adequate NEPA documentation.

RESPONSE:

The Plan and EIS are intended to be programmatic documents. A document of this sort is aimed at describing a program of winter use by stating goals and objectives and by determining the type of uses that are consistent with those goals. It describes the conditions under which certain activities are acceptable and provides general standards for management. It also provides an overall allocation of lands where certain activities are not consistent with objectives. A programmatic document is intended to provide direction it does not preclude additional NEPA, as appropriate, for actions on federal lands.

COMMENT:

On another tangent, the NPS has failed to provide for any meaningful cumulative effects analysis of motorized use year-round on the environment of the parks. What this DEIS has attempted to do is to abstract out a portion of the motorized use (winter) and analyze that.

RESPONSE:

The cumulative effects analysis will be reviewed and changes will be made as appropriate. The scope of the Plan and EIS is limited to the winter season. The effect of year round mechanized travel in the parks and on adjacent lands is best addressed in a general management plan.

COMMENT:

We do not understand why making the park accessible to economically disadvantaged persons is cited as support for the preferred alternative.

RESPONSE:

Providing affordable and equal access to park was identified as an issue of concern during the public scoping period. Large portions of winter visitors come from the surrounding area. Some people felt that once they arrived at the parks the cost of entering via oversnow vehicle (particularly for families) was exclusionary. Because the costs for winter access to the parks are higher than the summer the NPS felt it was an issue that was worthy of further consideration. It is important to note that providing equal access was only one of the many criteria used in selecting a preferred alternative. The commenter is referred to page 38-39 for a description of how the preferred alternative was selected. Due in part to non-support, the preferred alternative will be changed in the FEIS.

COMMENT:

It is much easier to count those snowmobilers that will be displaced by phasing out snowmobiles in the park than it is to count the nonmotorized visitors that have abandoned the park to snowmobiles. Everyone I have spoken to who has skied in the park says they no longer go, that they have been driven out by the snowmobiles. Your surveys of current winter visitors are interesting, but they are going to be biased towards those activities that currently dominate the park. For example, if there was no snowmobiling in the park now, all those visitors would be hikers and skiers, and you would get very different results. Your surveys should be distributed more widely.

VISITOR EXPERIENCE

RESPONSE:

In order to analyze how visitors might use the parks under the range of alternatives presented in the EIS three visitor surveys were conducted in 1998/1999. One survey conducted during the winter season of 1998-1999 included respondents who were visiting the three park units and the surrounding national forests. Two other surveys targeted summer visitors to YNP and the U.S. population as whole, as well as local and regional residents. The survey information presented in the DEIS reflects the only the winter survey data because the summer and national surveys were not yet completed. The new survey information will be added to the analysis presented in the FEIS.

COMMENT:

Under visitor use, need to include a statement on the benefits to human health. Should also include statement that this winter visitor activity is relatively low cost and accessible to minorities and low-income populations, compared to other options.

RESPONSE:

The public health section of the DEIS will be reviewed and additional information will be incorporated as appropriate.

COMMENT:

Under the "Open additional areas of the parks to disperse and accommodate use" the analysis fails to consider if there are appropriate old road corridors parallel to existing roads that are not in the potential wilderness areas. Old road cuts could provide unique and enjoyable nonmotorized recreation that was separated from the groomed motorized routes in Yellowstone.

RESPONSE:

Several of the additional trails proposed in the range of alternatives are indeed old roads. As the commenter notes, the selection was limited by the requirement that motorized use be excluded from proposed wilderness areas.

COMMENT:

Plowing the West Yellowstone to Mammoth Road will not justify the visitor savings for winter visitation.

RESPONSE:

There is no attempt by the NPS to justify road plowing in order to provide visitor savings. One of the issues raised during public scoping was affordable access.

COMMENT:

There is a statement that plowing the road will provide a less expensive alternative to snowmobiles but the data from the winter use surveys does not support your conclusions that the majority of people need or want a less expensive alternative.

RESPONSE:

No conclusions were made in the DEIS stating that a majority of people desire a less expensive way to access the parks. The issue was raised as a concern in during the public scoping process and the issue was addressed in the range of alternatives. In part, because of the opposition to the plowing the road option, a new preferred alternative will be identified in the FEIS.

COMMENT:

How noisy is a plow or snowblower going to be? What about the emissions from their diesel engines heavily loaded?

RESPONSE:

The discussion of the effects of these vehicles on air quality and the natural soundscape will be added to the FEIS.

VISITOR EXPERIENCE**COMMENT:**

What will happen when a buffalo or other wildlife fall off the sidewall of a plowed road, what will happen when the buffalo or other wildlife find it much easier to travel down a plowed road, what will happen when a vehicle traps a buffalo on the plowed road? What happens when Bison, Elk and other wildlife using the road as an easy travel route encounter cars and buses?

RESPONSE:

The effects of motorized vehicles on wildlife are disclosed for all alternatives in chapter IV of the DEIS and the FEIS.

COMMENT:

Your quest for all snowmobile drivers to have a valid driver's license, valid in the Park, was also a foggy accumulation of statistics showing that drivers under the age of 16 years had more accidents.

RESPONSE:

Currently all snowmobile drivers entering the parks must have a valid drivers license. The statistics presented for motor vehicle accidents will be clarified in the FEIS.

COMMENT:

Who is going to bear the cost of attracting bus tourists to replace the snowmobilers? Who will provide the buses? How many will there be? How much will they pollute the environment?

RESPONSE:

The mass transit bus system proposed under alternative B would be managed by the NPS and operated under permit by concessionaire. The number of busses as well as their impact on all natural resources is disclosed in the analysis of alternatives in the DEIS.

COMMENT:

Alternative B relocates the current overused access by snowmobiles to other areas of the Park particularly the South Entrance. This form of access by snowmobiles will have a greater impact than stated by the DEIS on GTNP and the Parkway.

RESPONSE:

The analysis of effects of alternative B will be reviewed and changes will be made as appropriate.

COMMENT:

Is it true that there is no study that has defined the winter carrying capacity of the parks?

RESPONSE:

Yes, although a feature common to all alternatives proposes that a study be conducted and that carrying capacities be implemented as appropriate.

COMMENT:

Why would the so-called preferred alternative B deny snowmobile access from West Yellowstone to Old Faithful when 56.6% of respondents favor this groomed snowmobile route and only 4.2% oppose.

RESPONSE:

The commenter is referred to chapter I of the DEIS. The NPS mandate requires that national parks be managed in such a way as to leave them unimpaired for future generations. This requirement means that visitor enjoyment of the parks is not the only criteria used in making decisions about the future management of our parks. While the enjoyment of park visitors is important it cannot take place at the expense of other park values such as wildlife and air quality. Due in part to the non-support of alternative B, a new preferred alternative will be identified in the FEIS.

VISITOR EXPERIENCE**COMMENT:**

It takes vehicles to accommodate the numbers that we're doing on snowmobiles today. Well, to do this, it's going to take a lot of snowcoaches. Where are you going to house them?

RESPONSE:

The snowcoach operations proposed in alternative G would be managed by the NPS and operated under permit by a concessionaire. Housing the vehicles is an implementation strategy that will be decided upon during the permitting process.

COMMENT:

And I worry about, what are six or eight or ten buses at the Paint Pots going to do when they have to keep running to stay warm?

RESPONSE:

The NPS shares your concern for air quality in the parks. Although it is unlikely that ten shuttle busses would all be idling at the Paint Pots the level of air pollution they produce is still far less than the air pollutants produced by the number of snowmobiles it would take to transport the same number of people. The analysis of air quality and public health will be clarified in the FEIS to more effectively illustrate the effects of various motorized vehicles on air quality.

COMMENT:

Again who's to pay for the excess cost of this [shuttle bus service] since it costs an average of \$38 per person plus a \$10 per person park entrance fee?

RESPONSE:

The park visitor will pay for the cost of the shuttle and entrance fee.

COMMENT:

Why do we need 6 miles of new oversnow trails?

RESPONSE:

The desire for additional types of oversnow experiences was an issue raised during the public scoping process.

COMMENT:

Is it really fair to take away nonmotorized access to non-groomed terrain?

RESPONSE:

The range of alternatives proposes a variety of different management options for nonmotorized use. Alternative F for YNP proposes that nonmotorized use be restricted to frontcountry groomed trails. The effects of this management option on visitor experience and natural resources are disclosed in chapter IV. In general expressions of opposition or support relate to the decision that the commenter would like the NPS to make. The commenters opinion will be considered in making the final decision, but there is nothing in the opinion that would substantively alter the range of alternative features to be evaluated in the FEIS.

COMMENT:

I wonder if plowing the road to Old Faithful will simply lead to more crowding by day users and more snowmobile use in other areas of the park.

RESPONSE:

The potential for increased snowmobile use in other areas of the parks under alternatives B, C, and D is a valid concern. A feature common to all alternatives requires that carrying capacity studies be completed and implemented. These studies are complex and will require some time to complete. Therefore the FEIS will also include as mitigation, interim capacities for several alternatives.

COMMENT:

So how can you justify closing the park to your winter guests?

RESPONSE: None of the alternatives proposed in the DEIS or the FEIS close the parks to winter visitation.
COMMENT: NPS will "determine visitor use capacities based on studies that set indicators and standards for desired visitor experiences and resource conditions." It seems backwards to us that this will occur after a management option has been selected rather than before.
RESPONSE: The NPS agrees that in some cases it would be optimal to determine carrying capacity levels prior to completing a programmatic visitor use plan. Because of the complex and political nature of the issues being addressed under this plan it was decided to complete a programmatic winter use plan first. A document of this sort is aimed at describing a program of winter use by stating goals and objectives and by determining the type of uses that are consistent with those goals. It describes the conditions under which certain activities are acceptable and provides general standards for management. It also provides an overall allocation of lands where certain activities are not consistent with objectives. After completion of a programmatic plan establishing carrying capacities will be a far more focused and refined process.
COMMENT: Who is going to pay for the grooming of trails currently funded by snowmobilers and who is going to patrol these areas and on what?
RESPONSE: The grooming of park roads is paid for by NPS road maintenance funds and ultimately --the taxpayer.
COMMENT: Is there a way to get a large number of persons around the parks and eliminate snowmobiles?
RESPONSE: See alternative G.
COMMENT: Were National Parks established to provide sites for aggressive motorized recreation? Were Yellowstone and the Tetons seen as exceptional because of their potential for this type of noise and pollution-creating recreation?
RESPONSE: Snowmobiling has allowed many thousands of winter visitors to enjoy the three park units. Allowing for the enjoyment of the resources that the parks have to offer is an important component of the NPS mandate. The commenter is correct that visitor use should not come at the expense or impairment of the natural resources of the parks. The alternatives presented in the DEIS and the FEIS are justifiable from an analysis standpoint. They all respond to various issues developed during scoping. The commenters objection to motorized recreation is noted, but there is nothing in that objection that would substantively alter the range of alternative features to be evaluated in the FEIS.
COMMENT: In the EIS I also read that the statement of the existing condition is based on park monitoring, use levels, and other information available through the 5-year assessment of winter visitor use (1999). Yellowstone has been around a lot longer than 5 years and I am curious why this assessment did not go back further to show the increasing popularity that the park is already experiencing.
Response: The assessment took 5 years to complete. The statement referring to the five-year assessment will be clarified in the FEIS.

COMMENT:

The NPS will not be denying winter access if they prohibit or limit snowmobiles.

RESPONSE:

The effects of limiting snowmobile access on the visitor experience are disclosed in chapter IV of the EIS.

COMMENT:

What is the cost of a snowmobile day tour? Does this allow you time to see Old Faithful?

RESPONSE:

Snowmobile rentals cost approximately \$100.00 + per day. Yes, it allows you plenty of time to see Old Faithful.

WATER AND AQUATIC RESOURCES**COMMENT:**

Air and water quality must be protected at the highest levels possible.

RESPONSE:

NPS is governed by the Clean Water Act.

COMMENT:

A reduction in the rate of snowmelt may impact hydrologic patterns and can lengthen the time period during which toxic compounds are released into the aquatic environment.

RESPONSE:

Although the rate of snowmelt may affect the time period over which pollutants are released into the environment, none of the research in the parks to date has investigated this question. For the most part, pollutants from snowmachines have not been found in aquatic systems.

COMMENT:

The DEIS presents an analysis based on current knowledge and studies of the impacts of each of the alternatives on the parks' water quality, including alternatives that call for continued snowmobile use. The FEIS includes information not available at the time of DEIS publication.

RESPONSE:

The DEIS presents an analysis based on current knowledge and studies of the impacts of each of the alternatives on the parks' water quality, including alternatives that call for continued snowmobile use.

COMMENT:

In regard to water quality, plowing the road from West Yellowstone to Old Faithful, and allowing buses and vehicles to travel that road during the wintertime will most definitely negatively affect the water quality in the park, based on your own premise, as stated on page 94: "[H]ydrocarbon pollution in water will initially persist on the surface and eventually settle in the water column, exposing fish and invertebrate populations." When the huge berms of snow created by the plowing of the Old Faithful road melt, along with all of the deposited pollution from buses and cars, where will that snow go? Into the park's watershed. Your study of impacts on water quality needs to be expanded to include pollution potential presented by buses and vehicles during the winter.

RESPONSE:

The DEIS describes the impacts of pollution from wheeled vehicles on plowed roads in comparison with the impacts of using snowmobiles. The impact analysis forecast a significant reduction in pollutants deposited in the snowpack by wheeled vehicles, albeit not to zero.

COMMENTS:

The Draft EIS fails to provide a comprehensive analysis of widespread adverse impacts of snowmobiles and groomed trails on the parks' wildlife, ecology, air and water quality, and nonmotorized users.

The DEIS failed to adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability on its beleaguered bison population, on predator/prey dynamics of coyotes and wolves, on critical but fragile thermally influenced habitat and vegetation, nor did it properly evaluate the cumulative impacts of all past, present, and future actions, including air and water quality impacts on vegetation and wildlife.

SUMMARY RESPONSE:

Analysis in the DEIS was adequate. Analysis in the FEIS incorporates information in all subject areas that was not available at the time of DEIS publication.

WATER AND AQUATIC RESOURCES**COMMENT:**

The Draft EIS does not adequately evaluate the seriousness of the impacts of snowmobile emissions on air and water quality.

RESPONSE:

The DEIS presents an analysis based on current knowledge and studies of the impacts of each of the alternatives on the parks' water quality, including alternatives that call for continued snowmobile use. The FEIS includes information not available at the time of DEIS publication.

COMMENT:

All the way through the document there are references to lack of data particularly in the impacts to water and wildlife yet the conclusions are that there will be major adverse effects. The conclusions if they are speculation should be stated that way otherwise a rationale must be presented to show why the conclusions are true even with a lack of data.

RESPONSE:

The commenter incorrectly states that the DEIS concludes there will be major adverse effects to water quality. The DEIS concludes that the different alternatives would result in a negligible, minor, or moderate effect on water resources (based on the assumptions and methodologies identified on page 163).

COMMENT:

Please refer to USGS "Water Resources Investigations Report 99-4148" prepared in 1998. This vital baseline information has been deliberately suppressed in the DEIS preparation for the above named parks.

RESPONSE:

At the time of printing the DEIS, the report in question (USGS report 99-4148) was not available. However, the earlier results provided in Ingersoll, et al. 1997 was cited in the DEIS. The more current report is included in the FEIS (Ingersoll 1999).

COMMENT:

What will happen if a group files a lawsuit over runoff from the roadway carrying sand or salt into the waterways?

RESPONSE:

Salt is not used on park roads. As described on page 206 of the DEIS, most sand would be collected with a street sweeper. The impacts on water resources are disclosed in the DEIS.

COMMENT:

Page 163, last paragraph, 4th sentence "...greater chemical disposition of (ammonium, nitrate...." Please remove the reference to nitrate should be removed because the study by Ingersoll (1998, 1999) found that nitrates did NOT increase proportionally to the amount of snowmobile traffic. Another regional source was attributed to be the nitrate source. This reported correctly on page 109, paragraph 3.

RESPONSE:

The reference to nitrates has been corrected.

COMMENTS:

The DEIS discusses the threat of degradation of streams as a result of snowmachine emissions. If this is truly a concern, then it is difficult to understand why Yellowstone officials have cut back on efforts to measure and evaluate the Park's streams. Its own Strategic Plan lays out the direction for this key issue, "Yellowstone no longer contributes funds to stream gauge monitoring programs due to funding shortages." The Plan further states that, "Ground water monitoring has been abandoned." We recommend an explanation that reconciles these actions since they seem to be at odds with the concerns referenced in the DEIS.

Is there currently any groundwater monitoring being conducted in the parks? Where? What are the historic/current trends?

WATER AND AQUATIC RESOURCES**SUMMARY RESPONSE:**

Yellowstone's strategic plan was in error relative to ground water monitoring. Yellowstone funds a network of over 64 groundwater monitoring wells. Surface water quality monitoring occurs on Soda Butte Creek to measure the effects of past mining activities upstream from the park. Additional surface water quality monitoring will occur on the Gibbon River. Stream gauging occurs on the Yellowstone, Lamar, Soda Butte (2 stations), and the Madison, with two of these stations funded by the NPS. Any cutbacks in water monitoring are due to lack of funds, not a lack of concern. The NPS (and others) have funded work by the USGS and Montana State University to specifically address the issue of snowmobile emissions on water quality.

COMMENT:

The DEIS is severely flawed and inadequate for the following reasons: (1) It fails to seriously consider a no-snowmobiling, no-trail grooming alternative. (3) It fails to comprehensively evaluate the impacts of snowmobile use on park wildlife (including threatened and endangered species), air and water quality, vegetation, serenity and solitude, ecology, park habitats (particularly fragile geothermal areas), and nonmotorized users.

RESPONSE:

The impacts of snowmobile use on the park's water quality are disclosed in Chapter IV of the EIS. Analysis in the DEIS was adequate. Analysis in the FEIS incorporates information in all subject areas that was not available at the time of DEIS publication. NPS considered and dismissed an alternative that would close the parks to motorized use because it does not meet the purpose and need for action.

COMMENT:

Amid all the rhetoric regarding snowmobiles and their use in the National Parks it must be remembered that despite the fact that snowmobile emission particulate matter has been detected in snow and water, there has been absolutely no evidence that this particulate matter has adversely affected any biological life forms in the Parks.

RESPONSE:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

COMMENT:

Easy solutions to air quality are not addressed.

RESPONSE:

The alternatives in Chapter II provide a range of concepts to address air quality issues. The effectiveness of the concepts is disclosed in the impact discussion in Chapter IV.

COMMENT:

The DEIS admits that sand would cause turbidity and an unnatural substrate deposition, but that it was unknown how this may affect the aquatic resources found in these waterways. This is not a sufficient analysis. The impacts associated with sedimentation must be identified prior to adopting any winter use plan.

RESPONSE:

The EIS discloses the estimated risk and potential impact for sand, which is used in conjunction with road plowing, to enter water courses through run-off. Since the quantity of sand required and the effectiveness of sand collection methods is unknown, the analysis presents potential risks and impacts.

COMMENT:

Page 229, second paragraph, sentence two: This sentence does not appear to reflect that alternative C requires ethanol blend and low emission lube oils. Under alternative C (Table S-1, S-2), a snowmobile not using these products (producing lower emissions) would be turned away from the park. Further, most snowmobiles entering from West Yellowstone currently have some amount of ethanol blend fuel. The sentence should either be removed or changed to identify that these fuels and lube oils are used.

WATER AND AQUATIC RESOURCES**RESPONSE:**

Alternative C provides that ethanol blend fuels and low emission oils would be sold in the parks. Use of the fuel or oil is not mandated; snowmobiles would not be turned away under alternative C.

COMMENT:

Water pollution may occur from snowmobile use. Samples found high levels of ammonia and sulfate in the snowpack along groomed roads (Pg. 180). However, there is no scientific evidence that these pollutants make their way into streams, or even if they do, the pollutants have an effect on fish or wildlife.

RESPONSE:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

COMMENT:

The plowing action will also require sanding of the road surfaces. Much of the road between West Yellowstone and Old Faithful is located in riparian areas. Sanding will cause an increase in sediment deposited in springs, streams and rivers, some of which are habitat for species that are proposed for protection under the Endangered Species Act.

RESPONSE:

As described on Page 206 of the DEIS, most sand would be collected with a street sweeper. The impacts of sand entering water courses is disclosed in the DEIS.

COMMENT:

The DEIS preferred alternative will not mitigate for snowmobile effects on Park water quality, ecosystem effects, or health effects. The Citizens' Solution would minimize water quality degradation as snowcoaches operate on four-stroke technology which does not emit unburned fuel and oil into surrounding snow. As stated earlier, snowcoach technology should be improved to include alternative fuels which further minimize emissions.

RESPONSE:

The impact analysis discloses the effects of each alternative on water resources.

COMMENT:

Again, the impacts associated with potential water quality degradation must be identified prior to adopting any winter use plan.

RESPONSE:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

Comment:

Page 163, paragraph 3, "Emissions from 2-stroke engine exhaust include carbon monoxide, hydrocarbons; particularly polycyclic aromatic hydrocarbons, methyl tert butyl ether...." The reference to methyl tertiary butyl ether should be removed because it was not found in the emissions of the engines tested in the work by White, Carroll, a Haines (see page C-3) listed as the reference. MTBE was not found in any of the laboratory work, nor in any of the snow samples in Montana listed in Ingersoll 1999. This illustrates and need to continue to study the environmental effects from all winter use emissions. The proposed adaptive management alternatives are critical to using the best information possible to manage and protect the health of employees, visitors, and the environment.

RESPONSE:

We concur. White and Carroll did not use a fuel that contained MTBE, thus none was found in the exhaust in their laboratory tests. The reference has been revised.

WATER AND AQUATIC RESOURCES**COMMENT:**

Page 179, bottom paragraph, last line: Please remove methyl-tertiary-butyl-ether from this sentence because it was not found in either study by Southwest Research Institute (page C-3).

RESPONSE:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

COMMENTS:

Page 180, top paragraph: This paragraph combines two very different studies—one on tailpipe emissions by White et al. and one on snow pack chemistry by Ingersoll et al. Please note that Ingersoll found MTBE levels in tens of parts per trillion and most standards are a thousand times higher (parts per billion) in the snow pack nearest the trail. MTBE and toluene measurements did not correlate with snowmobile use.

Page 180, paragraph 3, last sentence: The statement is correct that "impacts from emissions in runoff water have not been found" and should be referenced to Ingersoll 1999.

Page 181, first paragraph: Please change the sentence to read: "This disposition may have a minor decrease in pollution deposition into the snow, but might significantly reduce the persistence of emissions in the run-off water." This is based on two separate sets of findings. This supports the need for continued applied scientific studies to support an adaptive management approach to manage winter use in this area.

SUMMARY RESPONSE:

The text has been revised for the FEIS.

COMMENT:

Second, recent results from Ingersoll (1999) found no impact on runoff water. Preliminary work compiled by Montana State University also indicates that these emissions do not appear to persist in the environment. We feel continued and longer-term studies are important to determine the effects of emissions in the snowpack and runoff water. Continued applied research studies and an adaptive management approach are needed to protect human and natural resources.

RESPONSE:

As of early June 2000, results from the Montana State University study (Tyler, et al) had not been provided to the NPS. We concur that additional studies are needed.

COMMENT:

Unburned fuel, for example, deposited on soil may bind with soil chemicals potentially resulting in adverse impacts on vegetation, could percolate into underground water supplies, and/or could be washed into the aquatic system by runoff.

RESPONSE:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

COMMENT:

Similarly, if pollutants are deposited in the snowpack, the spring thaw will flush these toxins into the aquatic system and/or the soil will be impacted thereby potentially affecting vegetation growth, abundance, and composition.

RESPONSE:

The text has been revised to address the effects of toxins in snowmelt on aquatic resources.

WATER AND AQUATIC RESOURCES

COMMENT:

Several studies have determined that the survival, productivity, and distribution of amphibians is drastically impacted by increasing acidity.

RESPONSE:

The text has been revised to address the effects of water pollution on amphibians.

COMMENT:

Page 164, third paragraph, fourth. Sentence: It should read "...Road segments from West Yellowstone to Old Faithful were found to have levels of CO possibly exceeding national occupational health standards." Again there is an implication that the NAAQS were violated when, in fact, the methodology was not appropriate for such a determination. This would reflect that OSHA rather than NAAQS monitoring was conducted, and that OSHA levels may have been exceeded.

RESPONSE:

The text has been clarified to state that studies were characterizing air quality and personal exposure to pollutants.

COMMENT:

Page 229, 2nd paragraph, sentence four: Please see comments from page 180 identifying that emissions have negligible impacts on runoff, streams, and lakes.

Response:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

COMMENTS:

As a result of direct deposition of unburned fuel into soil, snow, or water or atmospheric deposition of airborne pollutants, the impact is not limited to the snowmobiles routes but, rather, are far-reaching.

The direct deposition of unburned fuel into the environment represents a substantial impact caused by snowmobiles nationwide. As previously explained, two-stroke engines release 25 percent of their fuel unburned into the environment. Collectively, considering the number of snowmobiles using the Parks this represents a substantial amount of pollution. In Yellowstone National Park, for example, of the 220,000 gallons of gasoline and 11,000 gallons of lubrication oil sold for snowmobiling by service stations in 1995, up to 55,000 gallons of fuel and 2,700 gallons of motor oil entered the environment as unburned, raw petrochemical pollution. If snowmobile routes are constructed near rivers, lakes, and streams -- as many are -- this amount of pollution poses a serious threat to these aquatic systems.

SUMMARY RESPONSE:

The text has been revised and a risk assessment of the impact of pollution on aquatic resources is included.

COMMENT:

The acidity of water also affected the survival of tiger salamanders.

RESPONSE:

The text has been revised.

COMMENT:

PAH's are by-products of fuel combustion found in high concentrations in unregulated two-stroke emissions. They are particularly hazardous because they are both carcinogenic and mutagenic, and are extremely persistent in the environment. The findings of these studies also correlate to studies on snowmobile emissions. ...such high concentrations are particularly alarming for fish larvae, zooplankton, and perhaps other marine organisms.

WATER AND AQUATIC RESOURCES**RESPONSE:**

The text has been revised to include a discussion of PAHs and their effects on people and the environment.

COMMENTS:

Snowcoach and trail grooming cause destruction of aquatic ecosystems.

In a study on the impact of two-stroke emissions on fish, Balk et al. (1994) determined that hydrocarbons disrupt normal biological functions.

DEIS fails to comprehensively evaluate the impacts of snowmobile use on park habitats (particularly fragile geothermal areas).

Grooming of roads has had significant adverse impacts on water quality including the deposition of additional pollutants into surface and groundwater.

SUMMARY RESPONSE:

The risk and potential for adverse impacts is disclosed in Chapter IV of the EIS.

COMMENT:

Nearly all snowmobiles are powered by two-stroke engines. These engines create dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, ozone, particulate matter, aldehydes, 1,3 butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons (PAH). Several of these compounds are listed as "known" human carcinogen. And several aldehydes including butadiene are classified as "probable human carcinogens." All are believed to cause deleterious health effects in humans and animals well short of fatal doses (EPA 1993).

RESPONSE:

The text has been revised for the FEIS.

COMMENT:

The DEIS then goes on to state that if winter visitor use is causing direct long term impacts to geothermal features, then those impacts must be mitigated or the features would be closed to visitors (page 205). Since impacts to geothermal resources are by definition long term (permanent), it seems imprudent to propose additional warming huts without a full analysis of impacts. Moreover, new facilities such as warming huts should be analyzed via a site specific EIS.

RESPONSE:

The original decision to place a warming hut was made in the 1990 Winter Use Plan. This new Winter Use Plan has proposed to reaffirm that earlier decision.

COMMENT:

Has anyone done a study what the snowmachines oil does to the water after the snowmelt?

RESPONSE:

The scientific literature available on this topic is summarized and cited in the EIS.

COMMENT:

The document also expresses a concern for water quality, but there is no scientific evidence presented that indicates elevated levels of ammonia and sulfate in the snowpack along groomed roads will ever make their way to a stream or are having a negative effect on fish or wildlife (Pg. 130).

RESPONSE:

The risk and potential for adverse impacts is adequately disclosed in Chapter IV of the EIS. The scientific literature available on this topic is summarized and cited in the EIS. The lack of evidence may also reflect the lack of research designed specifically for this issue.

WATER AND AQUATIC RESOURCES

COMMENT:

Incongruous wording occurs in the "Aquatic Species, Amphibians and Reptiles" section. The second paragraph begins, "Many fish species are becoming endangered..." This sentence is immediately followed with, "No fish of the YNP area is listed under the Endangered Species Act."

RESPONSE:

The text has been revised for the FRRS.

WILDLIFE

SUMMARY COMMENT:

FEIS should include research on the effects of snowmobile deposition pollution on the snowpack and on water quality.

SUMMARY RESPONSE:

The impact of snowmobile pollution and how they may facilitate the transport of toxins into the aquatic environment is being appropriately addressed by directly addressing the geology and chemistry of the system. Additional information in the form of a final published report (Bergvall, *Effects of Snowmobile Use on Snowpack Chemistry in Yellowstone National Park, 1993*) has become available since publication of the FEIS, and is incorporated into the final document.

SUMMARY COMMENT:

NPS failed to include a discussion on the effects of noise on wildlife.

SUMMARY RESPONSE:

NPS is studying the effects of machine noise on ambient sound levels and its potential effects on wildlife, and that the effects of noise on wildlife are included in the assessment of the effects of motorized recreation on wildlife. Nevertheless, a review of the impacts of noise on wildlife is included in the "Consider effects common to all alternatives" and additional data from a recent sound analysis study is included to better understand effects on natural quiet in the park for each alternative.

SUMMARY COMMENT:

Many comments revolved around the effects of grooming and the use of snowcoaches and snowmobiles. In general, the main issues concerned whether or not the use of oversnow vehicles affected wildlife through displacement or harassment, and whether or not groomed roads facilitated travel by animals out of the park or within the park. Others wondered why grooming would be allowed in the parks given that the EIS documents adverse effects.

SUMMARY RESPONSE:

The effects of groomed surfaces and the use of oversnow motorized vehicles on wildlife are assessed in detail under alternative A in the FEIS. Other park alternatives compare and contrast effects relative to alternative A. The concern over use of groomed roads as travel corridors to exit the park is a major issue in the FEIS. NPS has spent research and monitoring efforts in which bison use of groomed roads was shown to be relatively minor (Bennett 1993, Vavra et al. 2009). Instead, bison were described as traveling on their own, well-established network of trails, usually in response to changes or problems in the natural areas to access forage. The real danger of bison that exit the park on the west side is not leaving via the groomed road. Whether or not the roads are groomed with snowcoaches and snowmobiles are severe enough to impact populations in themselves, although the FEIS does note that impacts to wildlife are minor. Ultimately, it is up to the decision maker to weigh the available data and make the call as to what level of impact constitutes unacceptable. Commenters' reactions to any discussion of impacts in the FEIS or NPS "monitoring" and an action would cause harm should indicate that it is the purpose of an EIS to discuss the possible effects of a proposed action and alternatives to it.

SUMMARY COMMENT:

Many people were concerned about the effects of plowing the road on wildlife (particularly bison), and believed that plowing the roads would create large snow berms and consequently increase collisions and effects associated with habitat fragmentation. Commenters also speculated about the effects of plowed roads on energy expenditures, and most believed that plowed roads would be easier for bison and other animals to walk on than groomed ones, and, as a result, more animals would leave the park.

WILDLIFE**SUMMARY RESPONSE:**

The effects of plowed roads and the use of wheeled motorized vehicles on wildlife are assessed under alternative A in the FEIS, subsequent alternatives compare and contrast effects relative to alternative A. A variety of potential impacts to individual animals are disclosed, however the question is whether or not these impacts are severe enough to impact populations. Ultimately, it is up to the decision maker to weigh the available data and make the call as to what level of impact constitutes impairment. NPS does not believe that plowing the road would create snow berms large enough to seriously impede movements out of the road corridor. Other road segments within the park are plowed without any such result. However, mitigation measures to alleviate any effect of high snow berms are included in the FEIS. NPS asserts that there is no evidence to suggest that bison use of plowed roads would differ from their use of groomed roads, and that overall, use of groomed or plowed roads is minimal (Pyonlie 2000, Kurz et al. 2000). Instead, bison were described as traveling on their own, well-established network of trails, usually in riparian corridors or geothermally influenced areas. The FEIS includes additional information on bison movements and use of plowed roads.

COMMENT:

The discussion by the authors does not reference some work on the impacts of winter programs on wildlife. The following conclusion seems relevant to a discussion of the DEIS: "Recreation activity was not a major factor influencing wildlife distribution and cover use. The principle factors determining selection of cover types and the distribution of wildlife were the location of food coupled with minimizing the energy demands of the environment (Aune 1981)".

RESPONSE:

The FEIS contains an expanded discussion of the effects of recreation on wildlife, including Aune (1981). It is not required by NEPA to be an exhaustive review of the literature.

SUMMARY COMMENT:

Displacement by roads and trails results in habitat loss for wildlife.

SUMMARY RESPONSE:

Displacement by recreationists is discussed in detail under alternative A, and the potential displacement effects of other alternatives are compared and contrasted to alternative A.

COMMENT:

Animals covered by the Endangered Species Act are the species we are concerned about and any attempt to close portions of the Park other than temporarily to human use, motorized or otherwise, should not be permitted for any reasons benefiting non-endangered species.

RESPONSE:

NPS is concerned about protecting all species, but is mandated by the Endangered Species Act to give priority to listed species. The potential effects of all alternatives on these species are discussed in the FEIS. As required, an assessment of the effects of the preferred alternative is also found in the biological assessment published concurrently with this document.

SUMMARY COMMENT:

Several commenters expressed their support for protecting wildlife and carefully assessing the impacts of winter use.

SUMMARY RESPONSE:

NPS fully intends to manage winter recreation in a manner consistent with its mandate to conserve and protect all natural resources. The alternatives offer varying degrees of protection for wildlife, and mitigation measures are included to ameliorate any potential adverse effects.

SUMMARY COMMENT:

The DEIS did not sufficiently consider the impacts of alternative B on wildlife and other resources.

WILDLIFE

SUMMARY RESPONSE:

NPS believes this adequately discloses the effects of winter use on wildlife and other resources. The FEIS contains an expanded discussion of the effects of winter recreation on wildlife (see alternative A). Potential effects associated with alternative B are compared and contrasted with alternative A.

COMMENT:

I recommend maintaining (plowed, as now) the road from Mammoth to Cooke City. This road allows an unprecedented wildlife "show" unmatched elsewhere in North America. Because of the natural topographic and environmental gradient presented by the drainage of the Yellowstone River, restricting the road use by people would not gain much biologically versus very real values to be had by human use (this recognizes a necessary control of cross-country skier use of ungulate winter ranges). My second recommendation for enjoyment of the park by people suggests access in winter that would focus on the Old Faithful area as a terminal destination.

RESPONSE:

This comment refers to the decision to be made. This suggestion is a feature of alternative F, consequently, the decision maker could choose it from among the range of alternatives presented in the FEIS.

SUMMARY COMMENT:

The DEIS is severely flawed and inadequate for the following reasons: (1) It fails to seriously consider a no-snowmobiling, no-trail grooming alternative. (3) It fails to comprehensively evaluate the impacts of snowmobile use on park wildlife (including threatened and endangered species), air and water quality, vegetation, serenity and solitude, ecology, park habitats (particularly fragile geothermal areas), and nonmotorized users.

SUMMARY RESPONSE:

It is within the discretion of the decision maker to set the range of alternatives to be considered. How can the decision maker assess the impacts of an action without considering an alternative that includes it? If there is doubt about the level or type of use that might be acceptable, relative to impacts and mandated tolerances, then how can a determination be made without an appropriate range of alternatives? NEPA requires a "no-action" alternative (40 CFR §1502.14(d)). In this case, since motorized use exists, and was sanctioned in the past under existing rules, policies and plans, "no-action" is correctly interpreted as the existing management situation. CEQ directly supports this position. Its opinion is that in instances where ongoing programs are being evaluated, "no-action" is "no change" from current management direction or level of management intensity. In these instances, CEQ states: "To construct an alternative that is based on no management at all would be a useless academic exercise (Question 3 of CEQ 40 Most-Asked Questions)." NPS disagrees that it has failed in its obligation to disclose the impacts of snowmobiling on the parks resources and nonmotorized users. The CEQ regulations do not require exhaustive and voluminous discussion, especially when the discussion can be characterized as background and adding needless detail (40 CFR §1500.4 (f)). The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (40 CFR §1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at 40 CFR §1502.21 (incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure.

COMMENT:

There seems to be an analysis of effects on wildlife that is not well thought out. There is much discussion on effects on animals, some on how detrimental traffic is to disturbance of animals and then discussion of how animals habituate to patterns of traffic.

RESPONSE:

The FEIS contains an expanded discussion of the effects of winter recreation on animals. Perhaps the commenter may find this discussion more to his or her liking.

WILDLIFE

SUMMARY COMMENT:

The discussion of impacts to wildlife is insufficient.

SUMMARY RESPONSE:

In the FEIS, the effects of winter recreation on wildlife are considered in detail under alternative A. The effects associated with subsequent alternatives are compared and contrasted against alternative A. The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (§1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already asserts. Finally, the regulation at §1500.21 (Incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure.

COMMENT:

I was shocked that wildlife leaving the park during the winter was not a major issue in this document.

RESPONSE:

By "wildlife leaving the park" NPS assumes you are referring to the bison issue. Recent data does not support that the majority of bison are using the roads or extra corridors from the park. In the FEIS, NPS cites recent research and monitoring efforts in which bison use of groomed roads was shown to be relatively minor (Byers et al. 2000, Kurz et al. 2000). Instead, bison were described as traveling on their own, well-established network of trails, usually in riparian corridors or geothermally influenced areas.

COMMENT:

Wild game with or without groomed trails will wander in search of food, the trails have provided some easy means for some to move about but should not be used as a reason to keep snowmobilers from using the Park.

RESPONSE:

While addressed in the FEIS, wildlife use of groomed roads is but one aspect of the effects of winter use on the parks. Ultimately, it will be up to the decision maker to weigh the available data and make a call as to the overall effect of snowmobiling and other winter uses on all of the parks' resources.

COMMENT:

The DEIS states, "(d)isplacement and energetic costs are lessened when travel is more predictable and less dispersed. Shuttle busses on roads between West Yellowstone and Old Faithful may lessen displacement of wildlife relative to alternative A." That is poor reasoning at best. First, if this is so, then it is justification for alternative G over the preferred alternative (B). Second, it totally justifies a "no snowmobile" alternative that the DEIS dismissed.

RESPONSE:

NPS disagrees with the commenter as to the effects associated with alternative B. The mass transit feature will reduce traffic over the use of individual snowmobiles. Too much emphasis is placed on support or justification for a course of action or decision. Under the CEQ regulations, the requirement in an EIS is to provide a range of reasonable alternatives that clearly define the issues, and to fully evaluate and disclose the possible effects of those alternatives. Reference to a "justification" for a particular preferred alternative is an entirely different issue relating to the decision to be made.

WILDLIFE**COMMENT:**

A major contradiction exists in the discussion of nonmotorized uses which the DEIS states "can cause ungulates additional energy expenditure and reduce individuals' chance of survival." As a skier, I agree. I draw your attention to the oft misquoted Forest Service study (of which my copy has disappeared in the loaning process) that summarizes that the impact from snowmobiles is far more significant as they are in such greater number and penetration that when they stop and an operator stands, the individual impact is the same as with a skier. Remember that the vast majority of the nonmotorized use around geothermal areas is brought there on individual snow machines. This is an important correlation. The DEIS states that the PA "mitigates potential effects associated with these activities in YNP by eliminating unregulated backcountry use in winter range." Again, if this is the case, then snowmobilers should not be allowed to stop or stand up or walk in winter wildlife range (the geothermal areas). And if the NPS is looking out for the wildlife, why do they propose to have tens of thousands of people ravel into this winter range in the first place?

RESPONSE:

If NPS is understanding your comment correctly, the point is being made that backcountry nonmotorized users are being unfairly penalized by the backcountry restrictions called for under several of the alternatives. Impacts related to the operation of snowmobiles, including any effects associated with the operators stopping or getting off their machines, would, under alternative B (the former preferred alternative) be restricted to areas in the vicinity of the road footprint, and snowmobiling opportunities would be reduced over current management. Yes, they would be able to stand up or walk around to a degree, but use is predictable and relatively confined. Areas of high wildlife importance are closed to ALL users, and additional closures can be enacted at any time. The adverse effect of snowmobiles (in the parks, where they are highly regulated) on wildlife populations are not, on their face, indisputable, thus eliminating their use solely on the basis of wildlife impacts is not warranted under the parks' mandate to protect and conserve natural resources.

COMMENT:

In alternative C, there is an increase in the number of groomed trails for all users, but wildlife and the habitat needs do not seem to be properly addressed.

RESPONSE:

The alternatives were formulated purposely to provide a range of different actions and strategies, so that the effects of actions could be reasonably determined and compared. Each alternative proposes actions that optimize one or more aspects of the purpose and need for action. Alternative C maximizes visitor opportunities, whereas alternative F focuses on wildlife.

SUMMARY COMMENT:

Commenters stated that the parks did not have adequate data upon which to assess the impacts of winter use, specifically snowmobiling, on wildlife.

SUMMARY RESPONSE:

In the absence of park-specific data it is entirely appropriate to use the published literature and professional judgement to make inferences as to the level of effect a course of action may incur upon a particular species. Lack of data does not warrant a course of "no-action", but certainly points to the need for prudence and conservatism, while attempting to "fill in the missing pieces". Monitoring and adaptive management provide such input. An EIS is not, per se, a scientific analysis. It is intended to disclose environmental effects over a range of alternatives, in which the analyses must demonstrate scientific integrity by disclosing methods and making explicit references to sources used (40 CFR 1502.24). The FEIS does this. CEQ regulations also allow for incomplete or unavailable information, by describing procedures that are to be following in these instances (§1502.22). Any identified gaps in the FEIS will follow the requisite procedures.

SUMMARY COMMENT:

Several commenters expressed their desire that the park study the effects of winter use on wildlife, and the ecology of wintering wildlife in general.

WILDLIFE

SUMMARY RESPONSE:

A variety of research and monitoring projects are currently ongoing in the parks (including bison, elk, wolves, wolverines), and more are proposed (e.g., lynx, moose). Many of these studies have, or will have, a winter component.

COMMENT:

It is already known that certain areas that are seasonally used by specific species are particularly sensitive to any disturbance (e.g. geothermal areas). By allowing these recreational activities to continue without understanding their impacts on wildlife carrying capacities could prove to have negative impacts on populations and further disrupt the natural GYA ecosystem.

RESPONSE:

Many of the alternatives propose to limit recreational use of sensitive winter wildlife areas, including geothermal habitats. Ongoing monitoring projects continue to document wildlife impacts, and additional areas can be closed at any time if warranted.

SUMMARY COMMENT:

Some commenters stated that they could not find an assessment of the impacts to wildlife, or expressed concern over the general effects of recreation on wildlife.

SUMMARY RESPONSE:

Impacts associated with each alternative are clearly disclosed. See alternative A in the FEIS for a complete discussion; potential effects associated with subsequent alternatives are compared and contrasted to alternative A.

COMMENT:

Another area of concern is the birds whose habitat would be drastically reduced by timber clear cutting for the additional roads that are being considered. When the habitat loss is identified and noted as insignificant, then the alternative will have more inclusively addressed the issues concerning wildlife.

RESPONSE:

The only additional "road" discussed in the Winter Use Plan would be the re-located CDST proposed under alternative B. If this feature were selected by the decision maker, additional site-specific NEPA analyses would need to be conducted and the potential effects of timber cutting, should it be necessary, addressed.

COMMENT:

Why do they think commercial coaches will not "disturb" wildlife and private machines will?

RESPONSE:

The mass transit feature of alternative G reduces traffic levels by a factor of 8, and the snowcoaches will be slower and quieter. Furthermore, access will be more tightly regulated than private, individual machines (i.e., stops would only be made in areas that would not disturb wildlife).

COMMENT:

NPS should not readily dismiss the impacts associated with off-road snowmobile use. For example, the DEIS states that disturbance of den sites is not a concern because snowmobiles are required to stay on designated roads, and because of the distance of most potential denning habitat from roads (page 186). However, this may not reflect the reality on the ground. It is important that off-road impacts be fully analyzed.

RESPONSE:

Off-road or off-trail use of snowmobiles in the parks is unauthorized, incidental, and subject to penalties. Overall, such illegal use is minimal, and consequently, NPS is justified in its decision to not analyze its effects on denning grizzly bears in the parks. This issue may be more of a concern on adjacent US Forest Service land where snowmobile use (with the exception of wilderness areas and winter range closures) is largely unregulated.

COMMENT:

Wildlife carrying capacity is identified as an Issue or Concern Not Addressed in the DEIS because it "is a complex effort outside the scope of this study and the decision to be made". DEIS at 16. However, we would argue carrying capacity is not a management objective. It is a characteristic of the wildlife habitats in the Parks. Accurate knowledge about carrying capacity is necessary to understand the consequence of management actions on Park wildlife and therefore should be part of the DEIS.

COMMENT:

Pg. 323 - 324: This has redefined the concept of cumulative impact analysis relating to proposed actions. There is very little if any substantive discussion/summary of impacts proposed in the DEIS relating to surrounding areas. Where is the discussion on impacts to State and National Forest management issues created by the alternatives? Where is the acknowledgment that impacts from some of the alternatives, even if they were of some "short" term nature, could be very significant in affecting natural resource management decisions on neighboring jurisdictions. In Montana there could be impact as a result of closing the West Entrance to snowmobiling in the Gallatin and Madison Mountain Ranges. With the displacement of snowmobile activity to the north, in an area already providing high use winter recreation activities will come impacts to wintering wildlife, lynx, wolverine and pine marten habitat and human congestion. Many of the effects from existing increases in winter recreation activities are already creating some level of increasing concern. With an influx of additional recreationists, that in all likelihood will take place with some of the alternatives, these problems will be exacerbated over a very short period of time. This displacement to the north of winter recreationists could be short or long term in nature. The DEIS inadequately documents and discusses the impacts of the alternatives in the context of adding one more additional burden or concern in an area already receiving or being affected by many other types of human activity that the parks do not have to deal with inside their borders—Pg. 324, "Potential Sources of Impacts": We offer the following clarification to the discussion of the Quake Lake bighorn sheep die-off: The wildlife biologist responsible for this sheep population indicates that this population of sheep was increasing as a result of good lamb recruitment. The primary cause of the die-off is directly attributable to the winter of 96-97 (it was extremely harsh in terms of snow depth, temperature and length on the range these sheep occupied) and an associated pneumonia winter kill. Because of the relatively sudden and very quick die-off, we do not attribute all the other things listed in this paragraph as contributing significantly to the die-off. This was not a slow decline that could be indicative of an accumulation of all the "noise" that was mentioned in this paragraph. It was sudden and nearly complete.

The following Quake section in the DEIS has been revised and expanded. The Quake Lake bighorn discussion was removed.

COMMENT:

Will large busses be more intimidating to animals than small snow coaches and snowmobiles?

Response:
Traffic volume, speed, noise, and predictability are the most important considerations when assessing impacts to wildlife from motorized vehicles. Furthermore, NPS-managed mass transit would allow for greater control over where and when people stop to view animals; therefore such concern to smaller areas (e.g., roads) could be avoided.

COMMENT:

Man on snowmobile does not scare wildlife as much as a man on foot.

COMMENT:

Where is your discussion on development of a monitoring plan?

COMMENT:

The definitions of various levels of effects in Table 38 are very poorly worded. Moreover, given the methodology for evaluating impacts to wildlife and threatened and endangered and sensitive species, there are few objective criteria for determining measurability, perceptibility, localization or permanence of consequences.

COMMENT:

We suggest the snowmachine trail from Lost Creek to Antelope Flats be considered for closure. It is our impression that though this area currently receives limited use, keeping it open adds to the wildlife disturbance in this area, and this disturbance will increase if commercial operators start using this trail.

SUMMARY COMMENT:

Commenters expressed concern over the addition or enlargement of warming huts because of their effects on wildlife. Particular concern was expressed over the addition of warming huts in thermal areas important for wildlife. One commenter questioned how NPS arrived at its conclusion of effects on wildlife near huts located adjacent to thermal areas.

SUMMARY COMMENT:

Commenters objected to the relocation of the CDST to a route separate from the highway.

WILDLIFE

COMMENT:

The Preferred Alternative does not adequately address impacts on Cutthroat trout, Trumpeter Swans, moose, Sagebrush lizards, and a host of other species. Contrary to the assertions throughout the DEIS, habitat fragmentation is not a negligible to minor impact for many species.

RESPONSE:

The FEIS includes an extended discussion for species of special concern and ungulates. See alternative A for a complete review of impacts; alternative B is completed and compared to alternative A.

COMMENT:

Impacts to wildlife from winter recreation have been documented since the onset of snowmobile use in the 1960s (Yochim, 1998). Following a review of all available data on wildlife impacts from winter recreation, Caslick (1997) concluded that "there is now ample documentation to administratively close these thermally-influenced winter habitats, prohibiting winter use by private and commercial snowmachines, skiers, snowshoers, and hikers." Caslick also recommended that the Winter Use EIS "include alternatives of 'no snowmobiling' as well as ... consideration of alternative modes of transport for winter visitor enjoyment of park resources." (Caslick, J. 1997. Impacts of Winter Recreation on Wildlife in Yellowstone National Park: A Literature Review and Recommendations" Planning Office Files, NPS, YNP).

RESPONSE:

Several of the alternatives call for prohibiting or restricting use in geothermal areas and other sensitive winter wildlife habitats. Alternative modes of transportation are proposed as well (i.e. mass transit - by bus or snowcoach) and the preferred alternative would eliminate the use of private snowmachines.

COMMENT:

Table 4 of the DEIS alternative C would have the potential for increasing vehicle/animal collisions. But such impacts are also possible, though not identified, under alternative B as it also increased the miles of plowed roads as compared to the no-action alternative.

RESPONSE:

The FEIS identifies the increased risk of collisions in alternative B as compared to alternative A.

COMMENT:

The exhaust (sic) also collects on exposed vegetation (sic) which can be eaten by winter foraging animals. These toxins stay in the animal and are stored in the animal's fat

RESPONSE:

NPS is not aware of any study that has conclusively demonstrated that snowmobile emissions bioaccumulate in ungulates.

SUMMARY COMMENT:

Several people objected to the use of mass transit tour busses because they thought this would increase the number of visitors in the park, especially near Old Faithful and other geothermal areas.

SUMMARY RESPONSE:

See "visitor access" in the FEIS for alternative B. Increased use is not predicted under this alternative.

SUMMARY COMMENT:

General expressions of support for or in opposition to: grooming; snowmobiles; snowcoaches; plowing; regulating backcountry use; and mass transit.

WILDLIFE

SUMMARY RESPONSE:

Comments about the merits of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. People who commented in this fashion are asked to consider that there is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.

COMMENT:

I don't believe winter use is harming wildlife in not complying with the ESA.

RESPONSE:

The effects of winter recreation on federally protected species are discussed under each alternative. Furthermore, a biological assessment assessed the potential effects of the preferred alternative on these species. It is up to the US Fish and Wildlife Service to decide whether the effects are reduced or not.

COMMENT:

p. 82 & p. 120 - update Birds section as the peregrine has been delisted. Drop peregrine from T&E section since it is no longer listed unless you want it to be a Species of Concern.

RESPONSE:

The peregrine's status was revised in the FEIS.

COMMENTS:

The spotted frog is not considered to be a species of special concern by the State of Wyoming. In addition, only the southern population of the boreal toad is considered as such (Status 2). Boreal toads in the Greater Yellowstone Area are not considered as a species of concern.

p. 120, scientific name for western or boreal toad is incorrect in text- it is *Bufo boreas boreas*, and I believe it should be referred to as 'western' or 'boreal' but not both.

SUMMARY RESPONSE:

The FEIS was changed accordingly.

NEPA PROCESS

COMMENT:

The NPS must not rely on survey findings to revise and justify its final winter use management strategy, final EIS, and Record of Decision.

RESPONSE:

NPS reports on survey findings as part of the analysis of social and economic impacts, and visitor experience impacts. In some instances, this is the best available information relative to these analyses. The decision maker will weigh impacts in these areas, as supported by surveys, according to his or her decision criteria. The use of surveys is not appropriate when considering actual or potential impacts on resources.

COMMENT:

You should have given the hearing in West Yellowstone more consideration. Where 85 to 90% of the people testified against it. Why don't you ever listen!

RESPONSE:

The primary response is that resource management is not subject to a voting process. The hearing in West Yellowstone has been considered and is part of the record of public participation, along with hearings in other locations and the full body of comment on the DEIS. All sources considered, public opinion is far more evenly divided than the West Yellowstone results.

COMMENT:

I want to thank Governor Racicot for his hard work and his support of snowmobilers. It is unfortunate that the Park Service and yourself decided to work behind his back in developing the winter use plan after you had originally committed to include him in the decision making process.

RESPONSE:

NPS has exercised its role as the lead agency in good faith with respect to the cooperating agencies. The cooperating agencies know and have acknowledged that they do not have a say in the decision. The decision-making process lies exclusively with the park service. The state and other cooperating agency roles are limited to providing information in the areas of special expertise indicated in the signed agreements, or in document review as requested by NPS. Due to short time frames and inexperience in NEPA, the cooperating agency relationship was not implemented as effectively as it could have been. The flow of information has dominantly been from NPS to the cooperators, and information from the cooperators has been limited allegedly due to the park service providing inadequate time to respond. The FEIS provides more information about this process in the coordination and consultation section of Chapter I, and Appendix A.

SUMMARY COMMENT:

A number of comments indicate that people believe the park service agenda has been to eliminate snowmobiling from the three park units. A similar number of comments expressed the opposite, suggesting that the park service has slanted the process to keep snowmobiles in the parks. It is my opinion that your sole objective in both DEIS's, is to completely eliminate snowmobiling in Yellowstone National Park. From the way the alternatives are written and presented, to the analysis that is used to draw conclusion, it appears to me that this is a classic case of writing a NEPA document to support a decision that has already been made by management of Yellowstone and Grand Teton Parks. In violation of NEPA, the DEIS does not include an overly broad array of alternatives, but simply lists alternatives that either maintain the status quo or promotes increased use. Alternatives F & G begin to propose an "alternative" but have not been well fleshed out as compared to the 5 pro-degradation alternatives.

SUMMARY RESPONSE:

NPS developed an adequate range of alternatives in the DEIS with respect to the purpose and need for action and the major issues within the scope of analysis. Chapter I in the FEIS presents complete discussions in these areas.

SUMMARY COMMENT:

A number of comments objected to the number or location of public hearings on the DEIS. Some people felt there were too many hearings in the region and not enough elsewhere. Some felt there were not enough in the region.

NEPA PROCESS

SUMMARY RESPONSE:

NPS developed the schedule of hearings to the extent possible with the cooperating agencies, representing state and local government surrounding the three park units. One hearing was held outside the local region, in Denver, Colorado. The objective was to provide sufficient hearing opportunities in order to gain a representative sample of the cross-section of public input. Hearings were only one of many opportunities for people to provide input, including written comments, phone comments and e-mails. All comments, regardless of the delivery system, were incorporated into the comment database and considered equally.

SUMMARY COMMENT:

A number of comments addressed the length of the comment period, and suggested that it should have been extended for them, or they objected that it had been extended for a rival advocacy group and not for them. Cooperating agencies, or other speaking on their behalf, stated that there was insufficient time in which to provide information. Others suggested that the short comment period was a ploy by NPS to limit effective comment or to favor one or another advocacy group. Others request NPS to go back to court and seek to amend the settlement agreement to provide more time.

SUMMARY RESPONSE:

The comment period was initially set at 90 days with internet access, and 60 days following availability of the related DEIS. Early in the comment period, all requests for extension were denied because it would too heavily impact the Park Service's ability to meet the court ordered (under a settlement agreement) deadline for producing an FEIS and decision. Later in the comment period, a two-week extension was granted because documents had not been available to all at the appointed time due to the Park Service's distribution problems. This extension took two weeks out of the available time for comment analysis and FEIS production. Later, (and for Animals (the plaintiff in the lawsuit) requested an extension to which NPS agreed because the plaintiff also allowed the final deadline to slip by the same amount. The total time available for all to comment following publication of the document was about 90 days. In any case, the comment period was sufficient under the regulations for this kind of document (40 CFR §1505.10 (c) sets a minimum of 45 days public comment on a draft EIS. Subsection (d) states that the inability to provide comments within the set time frame is not sufficient reason to extend the comment period). Through discussions with the plaintiff on the various requests for extension, it is clear that they would not agree to any amendment of the settlement dates that would push the winter use status quo beyond this year.

COMMENT:

NEPA directs the NPS to insure that unquantified environmental amenities and values are given consideration. The Draft Plan provides no estimate of the intangible or nonmarket benefits and costs of the proposed action (consumer surplus, option value, existence value, and bequest value).

RESPONSE:

40 CFR §1502.23, Cost-benefit analysis, states that "for purposes of complying with the Act (NEPA) the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis, and should not be when there are important qualitative considerations." In this instance, NPS decided that a cost-benefit analysis is not relevant to a decision among environmentally different alternatives. However, estimated administrative costs are illustrated in Appendix B -- and a discussion of nonmarket values in the DEIS (p. 92) has been supplemented in the FEIS.

COMMENT:

The intent of NEPA was for the NPS to implement policies based on science, not extreme environmentalist mythology.

RESPONSE:

The intent and the purpose and need for action are fully explained in Chapter I of the DEIS and the FEIS. The analysis of impacts relies to a large degree on credible, and credible literature, fully cited in the document.

COMMENT:

If the NPS finds "new" scientific evidence after the release date of the "Draft" EIS, then it will have to save it for the next NEPA planning cycle. The intent of NEPA is to ensure federal management agencies have the full benefit of the wisdom of the American people before making management decisions. The full NEPA public review process is especially important when NPS managers are proposing changes that are as fundamental and potentially damaging to the human experience as is currently being suggested. It might not surprise Yellowstone managers that they have not developed a consensus among all the winter stakeholders for the proposed changes, so they cannot claim to have the credibility to represent the best interest of the Park users. To many Park visitors, the so-called "adaptive management" concept is a kind of "precaution" so that Park managers can implement their personal "environmentalist" interpretations without going through a full NEPA public review process. That is, they can remove people from their preferred use of the Park's roads without full public scrutiny of the Park's rationale. Therefore, there will be now so-called "adaptive management," which might be more aptly referred to as a "conspiracy to avoid public wisdom."

RESPONSE:

Adaptive management is a cyclical management approach. The proposed action is to develop a plan for winter use in the three park units. From that plan, the plan that may eventually be selected would require further public involvement and NEPA documentation. The EIS is a management plan, which relates to winter use planning that was not available at the time of EIS development. NEPA regulations allow plans to be developed on the basis of best available information. It is reasonable to acknowledge the continuing need for monitoring and data collection, such as other management decisions, for the winter use plan. It may be of interest that concerning legislation in this process was the Utah National Guard, who made a plan to conduct war games recommended an adaptive management approach (referred to as alternative B). The adaptive management process is being implemented in the EIS.

COMMENT:

Please give full consideration to an alternative that would prohibit snowmobiles, snowcoaches, and trail grooming. Failure to do this would likely violate the National Environmental Policy Act.

RESPONSE:

In concert with CMA regulations, NPS developed a sufficient range of alternatives for winter use in the three park units. NPS does not agree that, based on current information, an alternative for no winter access or use is reasonable in light of its statutes. Given that, the proposed winter use plan and related management actions satisfy regulatory or management standards or other management actions that would impact or eliminate the benefits of winter use activities.

COMMENT:

Your position as a public servant and employee should be to present the possible options, not suggest one is somehow preferable or necessary.

RESPONSE:

The proposed winter use plan is the result of alternatives in both the EIS and the EIS. In accordance with CMA regulations, NPS chose to develop preferred alternatives in the EIS. 40 C.F.R. 15.112, (b) states that if the agency has a preferred alternative or alternatives, it shall so state in the EIS. An agency must propose a preferred alternative in a Draft EIS.

COMMENT:

After careful examination, GYC has determined that the National Park Service's (NPS) preferred alternative B is inadequate and, if implemented, will not protect park resources as required under guiding legislation and regulation.

SUMMARY COMMENT:
 Although we question the necessity of needing an EIS for these two parks, we do realize that it has to be done. I urge you to represent honesty in the National Park Service and not use a DEIS procedure that is mandated by specific rules of NEPA for a programmatic review of our National Parks system. This is noted in the first paragraph on page 17, Volume 1, of the DIES.

SUMMARY COMMENT:

Although we question the necessity of needing an EIS for these two parks, we do realize that it has to be done. I urge you to represent honesty in the National Park Service and not use a DEIS procedure that is mandated by specific rules of NEPA for a programmatic review of our National Parks system. This is noted in the first paragraph on page 17, Volume 1, of the DIES.

SUMMARY COMMENT:
 NPS along with other Federal agencies by law (NEPA) must use the best available information in the first parts (1001 to 1500) to evaluate impacts for the actions. Such actions include the development of plans such as this. The NPS agreed in a court settlement to write a comprehensive plan for winter use planning. Part of the lawsuit that precipitated this agreement alleged that NPS was planning winter recreation in major Federal action without having subjected it to a NEPA analysis.

COMMENT:

The NPS is remiss in having allowed the proliferation of snowmobile use without first conducting an EIS and without providing opportunities for public input.

RESPONSE:
 This allegation was made in the lawsuit filed against NPS by Fund for Animals in 1997. The issue is resolved at this time since NPS agreed to write an EIS. However, the history of winter motorized use in the three park units is of interest as the lawsuit issues and topics explained in this EIS. A brief history has been added to the EIS in Chapter 1, as well as a discussion of the 1997 court settlement agreement.

SUMMARY COMMENT:

The DEIS discussion of alternatives considered but eliminated from detailed study fails the NEPA requirement for a broad array of alternatives as stated above. It does not matter whether you have already decided that to eliminate snowmobile use in the parks is unacceptable or not. It is a viable alternative, by law, and thus worthy of consideration. The DEIS states that oversnow motorized use is considered to be within the range of recreation opportunities to be provided. Total elimination of oversnow motorized use without analysis would not be within the scope of the purpose and need for action.

SUMMARY RESPONSE:
 In order to evaluate the effects of winter recreation use and find the appropriate mix within the managed constraints, alternatives were developed with varying types and levels of use. A full range of reasonable alternatives was evaluated in the DEIS to meet the need. NPS decided it was not consistent with its mission to consider an alternative that effectively and completely closes the parks to winter use as it was desired that visitors not to consider alternative use. The law does not allow that NPS analyze or develop an alternative that closes the parks. NEPA has been used, as is NEPA required, but there is no adequate range of alternatives in this document.

SUMMARY COMMENT:

NEPA has successfully brought environmental issues into the decision-making process and corrected past environmental inequities, however, it has also created human inequities. The current NEPA process does not provide the proper evaluation and recognition of the needs and rights of "Non-NEPA Activist Citizens" in the decision-making.

Summary Response:

This NEPA process, as required by the CEQ regulations, has been open to all citizens from the beginning. Opportunities for public involvement have been advertised in the Federal Register and in a variety of public media to solicit involvement or as many people as possible. About 45,000 copies of the DEIS and a great many related comments originated during the review period. NPS has no means for communicating between active citizens and others relative to the impact they provide, nor would it be appropriate to do so. NEPA requires access by the general public.

SUMMARY COMMENT:

A number of commenters objected to the involvement of states and counties as cooperating agencies in this NEPA process on the basis of lack of jurisdiction and special expertise, and a perception of skewing the alternatives, the analysis or the decision.

Summary Response:

State and local governments are entitled under NEPA to act as cooperating agencies, given their special expertise as described in the cooperative agreements. See Consultation and Coordination in Chapter I of the FEIS, as well as Appendix A. Given the short time frames and the lack of experience in some quarters for dealing with NEPA process, the relationship was not as effective as it could have been.

SUMMARY COMMENT:

A number of commenters supported the involvement of states and counties or other federal agencies as cooperating agencies in this NEPA process and felt that not enough emphasis was placed on their role or the information they provided. Some felt that NPS ignored the cooperators or conspired against them.

Summary Response:

State and local governments requested cooperating agency status under NEPA, and listed their basis in special expertise as part of the cooperative agreements. See Consultation and Coordination in Chapter I of the FEIS, as well as Appendix A. Given the short time frames and the lack of experience in some quarters for dealing with NEPA process, the relationship was not as effective as it could have been.

COMMENT:

The DEIS does not fully disclose impacts that may occur in the GYA, as a result from the EIS's alternatives, including the preferred alternative. The GYCC's Winter Visitor Use Management document with its strategies and desired outcomes may be jeopardized by alternatives included within this DEIS.

Response:

The multi-agency assessment is not a NEPA document. However, the desired outcomes shown in the assessment were starting points for desired conditions listed in the DEIS. The DEIS builds on and carries forward in the GYCC multi-agency assessment. The description of impacts on adjacent national forest or other public forest lands in the DEIS describes the relationship sufficiently. NPS has fully disclosed input from the Forest Service and others in the DEIS, and is open to any mitigative strategies that they might propose. To date, no definitive strategies have been advanced other than the suggestion that NPS not make a decision that might curtail snowmobile use to adjacent lands. This would mean that NPS cannot address any of the elements in the purpose and need for action, leaving the choices to the states and.

SUMMARY COMMENT:

NPS demonstrated that they do not have the expertise to handle this complex subject when they recently released an air quality report, produced by their Air Resources Division, which was flawed and contained erroneous interpretations of data. This report, purportedly, was simply a collation of existing research which has been recently completed. If NPS air quality "experts" can't get something as simple as collating existing data right, how can they be expected to produce credible, and reasonable, new emission standards for snowmobiles? This report was not part of the DEIS so it could not be reviewed by the public or by the cooperating agencies. NPS is required by the MOA to allow the cooperating agencies to review such items.

NEPA PROCESS

SUMMARY RESPONSE:

The ARL report is derived from data independently from the DEIS, and it was not used even in draft by the NPS winter use planning team. Any information in the report, and/or summarized, cannot reasonably be used to disavow the DEIS or the winter use planning team. Similarly, the funding of the report is not a consideration for the commenting agencies' review is outside the purview of the winter use planning team and the DEIS process.

SUMMARY COMMENT:

There is a statement that the standards will be made and maintained for the Park even if EPA sets a different standard for snowmobiles. This appears to me to be an attempt to influence the standards that EPA will impose which is not the role of NPS. Studies and regulations regarding snowmobile emissions should be conducted by EPA, not NPS.

SUMMARY RESPONSE:

NPS has an affirmative role, and the singular authority, to impose conditions on park users for the protection of park resources and values. EPA supports this statement of authority. This means that, while NPS cannot set vehicle emission standards, it can set limits on the types of vehicles that may enter the park. For example, NPS has the authority to require permits and it can stipulate conditions in those permits. Current park regulations disallow use by certain types of vehicles and give rangers the authority to refuse access to excessively noisy or polluting vehicles.

COMMENT:

Bluewater Network suggests that the NPS encourage the development of EPA's program and by 2002 only allow those snowmobiles with the best possible environmental label.

RESPONSE:

EPA indicates that it will not even be addressing any new regulations or standards for snowmobiles. The McGraw-Hill document with potential provisions for the three park units has a NPS agenda document on winter use plans. Should EPA at some point require stricter controls on emissions from snowmobiles, they would concurrently apply to any vehicle use in the parks (as stated in the DEIS).

ALTERNATIVE FEATURES

GENERAL RESPONSE:

Many suggestions for alternative features made by commenters have already been incorporated in one or more of the alternatives presented in the DEIS. Some of these suggestions were slight variations of alternative features included in the DEIS. It is important to note here that numerous suggestions for alternatives and alternative features were made in the thousands of comments received. It is clear that for such complex issues that an infinite number of possible alternative features and combinations of features could be developed. CEQ regulations require that in such instances, the agency need only consider a reasonable number of examples that cover the full spectrum of possible alternatives that meet the purpose and need (Question 1b, CEQ 40 Most Asked Questions.) What constitutes a reasonable range depends on the nature of the proposal and the facts in each case, where the proposal is at the discretion of the agency.

The winter use plan is intended to be a programmatic plan, that is, it is intended to make decisions at a general level and defer many site-specific or implementation types of decisions to a later date (much like an NPS General Management Plan or a USFS Forest Plan). In addition to general decisions, programmatic plans and EIS's may contain (as alternative features) processes that would be followed such as adaptive management or advisory committees. In a programmatic document it is also appropriate to examine whether certain management activities are contributing to an issue or problem relevant to the plan. These types of features (for example lower speed limits) may appear to be solely implementation strategies and not appropriate for inclusion in a programmatic document. The important distinction, from a programmatic perspective, is that in some cases a smaller or more specific feature such as speed limits may affect a programmatic issue, such as public safety. The question for the programmatic analysis is not whether the safest speed is 35 or 45 mph, but whether oversnow vehicle speed is a significant contributor to vehicle accidents.

Many people focused on the features of comments that they favored and many focused on those features to which they were opposed. While this information is important to relay to decision makers it does not warrant a formal response under CEQ regulations (see §1503.4). Other commenters repackaged various existing alternative features into new groupings, or formed their own "preferred alternative" from the range of alternatives in the DEIS. Again, this information, while important to the decision maker, requires no further response under NEPA. The reason behind this determination is simple. In the final selected alternative, a decision maker is free to mix features from the full range of alternatives analyzed in the FEIS. This mixing can occur as long as the mixed features are consistent and the effects of such an alternative would not fall outside the range of effects disclosed in the analysis. Thus, presenting a remix of alternative features as a new alternative would be redundant and serve no analytical purpose. All the alternative features presented in the DEIS remain available for selection by the decision maker.

Alternative features that were suggested by commenters that are currently represented in the range of alternative features represented in the EIS have been responded to by simply making reference to the appropriate alternative. Where entirely new suggestions for alternative features or mitigation strategies have been made they have been responded to in full. Many suggestions for alternative features, while difficult to implement, show remarkable creativity. Although not appropriate for inclusion in an alternative many of these suggestions may prove helpful to park managers as they implement the final decision.

Because of the volume of public comment it has been necessary to summarize some comments, particularly those that were made by numerous commenters. Every effort has been made to retain the commenters original words and comments that have been summarized are identified in the text.

SUMMARY COMMENT:

Nighttime closures should be implemented. Suggested times for park closures included from 10 to 5 AM, sunset to sunrise, midnight to 4AM, and 8PM to 6AM.

ALTERNATIVE FEATURES

SUMMARY RESPONSE:

See alternatives B, D, F, G.

SUMMARY COMMENT:

A speed limit of 35 mph should be established on all snow roads. Lowering the speed limit from 45 to 35 will reduce fuel consumption and lessen the noise level.

SUMMARY RESPONSE:

See alternative E.

SUMMARY COMMENT:

As a matter of safety, those using oversnow vehicles should be encouraged to stay away from or prohibited entirely from riding in those areas with high avalanche danger at all times, but especially near dusk and into the night. Eliminate use of military ordinance—stop using military explosive use of military explosives and expensive avalanche control efforts, particularly at the east entrance. These are counterproductive and should be severely curtailed. The National Park Service should close Sylvan Pass in the winter.

SUMMARY RESPONSE:

See alternative D.

SUMMARY COMMENT:

There are carrying capacity limits. Adaptive management is the best way to keep on top of these concerns and deal with them when problems arise. An adaptive planning approach that allows the results of new and ongoing research and monitoring to be incorporated into winter park management decisions after it has been subjected to independent third party review would solve many of the issues that this creates. Qualified peers or groups like the National Academy of Sciences would conduct third party review.

SUMMARY RESPONSE:

See alternatives B and E. With regard to third party review, there are policies and protocols in place to ensure appropriate scientific review. If future studies or monitoring indicate the need for management action the NPS will follow the requirements already set in law (such as NEPA) regulation and policy. At that time the scientific basis for an action can be scrutinized and criticized by any interested parties.

COMMENT:

A public involvement process in accordance with NEPA and a year notice should be required before any closure is implemented. The public comment period during this public involvement process should be at least 120 days in length because of the national interest such proposed closures would generate.

RESPONSE:

NEPA and its implementing regulations will be followed as appropriate for all implementing actions. The minimum comment period allowed for an EIS under NEPA is 45 days, however a 60-day comment period is normal. Normally, 30 days are allowed for comments on an environmental assessment.

SUMMARY COMMENT:

Snowmobiles should be forced to use biodegradable oils.

SUMMARY RESPONSE:

See alternatives B, C, D and F.

COMMENT:

Limiting emissions of snowmobiles' noise and pollution soon by at least winter of 2002 is the only answer.

RESPONSE:

See alternatives B, D, F and G.

ALTERNATIVE FEATURES	
COMMENT:	Perhaps entrance fees and check-in areas could be placed at all entrances.
RESPONSE:	Entrance fees and entrance stations are currently in place at all park entrances. None of the alternatives presented suggest eliminating or adding entrance stations or entrance fees.
SUMMARY COMMENT:	In order to preserve the great wildlife populations of that area, winter management needs to be revised so as to vastly reduce the extent of plowed roads.
SUMMARY RESPONSE:	Alternatives A, D, E, F and G do not increase the miles of road plowed. US 191 is a major commercial route and traffic corridor linking the cities of Bozeman, Big Sky and West Yellowstone to Ashton and Idaho Falls. The 11-mile section through the park is currently plowed to maintain this access. The road from Gardiner to Mammoth to the Northeast Entrance is plowed to provide the only wintertime access to Cooke City, Montana. For GTNP see alternatives D and G.
COMMENT:	Snowfall on the remaining road system (Norris to West Thumb via Lake and South Gate to Old Faithful) is heavy and accumulates to great depths. Hence, plowing these roads is not feasible, and travel on them should remain over-snow. However, the National Park Service should restrict travel on them to snowcoaches, which would eliminate snowmobiles from the park altogether. We would support a road into the winter lodges for bus traffic only.
RESPONSE:	See alternatives B and G.
COMMENT:	Not surprisingly, given the interests of the state and county cooperators in ensuring that motorized oversnow vehicle access to the Parks continued, they failed to develop a single alternative which prohibited or even significantly reduced snowmobile use in the Parks.
RESPONSE:	See alternative G.
COMMENT:	Provide expanded non-motorized opportunities/trais away from main motorized routes by providing regular skier shuttles from Old Faithful and West Yellowstone to non-motorized areas away from these sites.
RESPONSE:	This suggestion is programatically compatible with all alternatives, and could be implemented without further significant environmental review (as a function of the Winter Use EIS and the decision resulting from it). Whether solitude can actually be achieved by this separation depends upon site characteristics and the degree to which motorized use occurs travel in the area.
COMMENT:	Ban and/ or do not renew permits for snow planes in Grand Teton National Park.
RESPONSE:	See alternatives E, F and G.
COMMENT:	The Continental Divide Snowmobile Trail should be closed to snowmobile use.
RESPONSE:	See alternatives G and E-F for GTNP and alternative D for YNP.

ALTERNATIVE FEATURES

COMMENT:

Maintain and improve current destinations in the park.

RESPONSE:

See alternative A, et al.

COMMENT:

Increase interpretive opportunities. Improve but don't expand day use facilities, including interpretive and enforcement presence.

RESPONSE:

See alternatives B, C, D, F and G.

COMMENT:

Close Grand Loop road from Canyon to West Thumb.

RESPONSE:

These alternatives effectively close large portions of the park, but the closed segments (e.g. Fishing Bridge to East Entrance, Mammoth to Madison and West Yellowstone to Old Faithful) respond to identified and significant problems. In terms of roads and visitors, CPS saw no reason to have an alternative closing the Canyon to West Thumb segments. It would be a function of adaptive management in alternatives B, E and G or the determination of some significant impact at a later date, to find the need for closing that entire east side.

COMMENT:

Provide a mix of snowcoach, snowmobile, including private and rental, access from each of the remaining entrances, south, west, and north

RESPONSE:

See alternative D.

COMMENT: Base limits on clean-air quality standards and visitor experience requirements, similar to Grand Canyon corridor management principles. Implement by the year 2004 and '5.

RESPONSE:

Please see discussion under "comment to all alternatives" on page 23 of the DEIS. All alternatives include the determination of winter carrying capacities. In greater detail, a carrying capacity is a highly complex and potentially elusive exercise. NPS resources devoted here was not sufficient what available in the management time frame to develop this type of analysis. NPS is developing visitor use estimates for each alternative that will be the basis for a more detailed analysis and for mitigation. Some mitigation will be in the form of visitor use limits during carrying capacity analysis. The seven year average will be the level of management needed at the park, carrying capacity will be optimum. Management plans described in Table C of the DEIS define management principles for each of the alternatives using criteria such as visitor experience and natural resource conditions (e.g. timing, quantity). Monitoring indicators and standards will be included for these criteria in the FEIS.

SUMMARY COMMENT:

Improve but don't expand day use facilities, including interpretive and enforcement presence. Develop modest winter use visitor center at Lamar Station. We also suggest that a way to encourage the broadening of the public's minds toward all forms of oversnow transportation would be to develop a snow museum.

ALTERNATIVE FEATURES

SUMMARY RESPONSE:

See alternatives B, C, D, F and G. The suggestion for a winter visitor center at Lamar is appreciated, however, while other winter facilities proposed in the EIS respond directly to identified and significant problems, the NPS saw no winter related reason for a visitor center in Lamar. The NPS agrees with the commenter that increasing visitor access to interpretive information is nearly always beneficial it is also equally important to develop alternatives that are fiscally prudent and that can reasonably be implemented. In the future if a need for a winter visitor center at Lamar were identified it would be consistent with the purpose and need for this plan and could be implemented (following site specific NEPA as appropriate). The NPS also appreciates the recommendation to develop an overflow transportation museum, while some of these topics are covered in existing exhibits and programs, more could certainly be done. As site specific planning for winter interpretive programs is developed exhibits of this type could certainly be included.

COMMENT:

For GT and Parkway, eliminate CDST, replace with shuttle concession.

RESPONSE:

See alternatives B-F.

COMMENT:

Delay road-opening initiation of plateau until 4/30.

RESPONSE:

See alternative F.

COMMENT:

Continue scientific studies of winter use and wildlife. Restrict motorized and non-motorized use as warranted.

RESPONSE:

See alternatives B and E.

COMMENT:

Implement information program cooperation with local communities. Continue working with GYCC.

RESPONSE:

See alternatives B, C, E, F and G.

SUMMARY COMMENT:

Require new technologies for reducing snowmobile emissions and sound.

RESPONSE:

See alternative D.

COMMENT:

Reducing noise to 60 dB(A) is better expressed as a goal over a period of time that considers among other things, economic and technological feasibility.

RESPONSE:

Alternative C allows for a phase in period of nearly 9 years.

COMMENT:

Some things to consider regarding alternative E- 1. Establish acceptable standards for noise, air and POPULATION contamination. 2. Allow no snowmachines in the Park area. 3. Allow no privately owned snowmachines. 4. Allow permits only for snowmachines rented to visitors by snowmachine liveries outside the Park Area. Such machines to be vetted in accordance with Item 1. Above and so licensed.

ALTERNATIVE FEATURES**RESPONSE:**

Alternatives B and D establish standards for sound and snowmachine emissions in the parks. All alternatives suggest the setting of carrying capacities. A mitigation strategy that requires that all snowmobile riders be accompanied by a guide will be added to alternative F. It is unclear what issue or concern might be addressed by requiring that rental snowmobiles must be rented outside the parks.

SUMMARY COMMENT:

Combine alternative G and the citizen's alternative.

SUMMARY RESPONSE:

A discussion that compares the elements of G and the "citizens alternative" will be added to the FEIS (chapter I).

COMMENT:

I would like the 60 dB (A) noise be modified to 70 dB(A).

RESPONSE:

See alternative B.

SUMMARY COMMENT:

We suggest that a new alternative be created that restricts all winter visitors to some degree, does not accommodate automobiles, calls for limits on snowmobile emissions and noise, advocates design of research studies to learn about these winter use impacts, and uses concepts of adaptive management for implementation of the plan.

SUMMARY RESPONSE:

Please see Chapter II of the DEIS.

SUMMARY COMMENT:

I believe nonmotorized recreation opportunities should be directed away from motorized trails to avoid conflict. If the park wants to reduce the conflict in this area, then separate the two users. I know that cross-country skiers do not want to smell the exhaust from snowmobiles and snowmobiles do not want to have the hassle of avoiding skiers.

RESPONSE:

Please see alternatives B, C and G.

SUMMARY COMMENT:

If the road from West Yellowstone to Old Faithful is plowed and open to all vehicular traffic, snowmobiling adjacent to the road or anywhere in this area must be prohibited.

SUMMARY RESPONSE:

For safety reasons an alternative that provides a snowmobile trail adjacent to the plowed road from the West Entrance to Old Faithful was dismissed from further study. The commenter is referred to the discussion on page 38 of the DEIS.

COMMENT:

The National Park Service should restrict travel on all newly plowed roads (West Yellowstone to Old Faithful and Madison to Mammoth) to publicly operated vehicles such as buses and vans.

RESPONSE:

See alternative B.

COMMENT:

The NPS should not only plow the road from West Yellowstone to Old Faithful, but should also plow the road from Madison to Mammoth.

ALTERNATIVE FEATURES	
RESPONSE: See alternative C.	
COMMENT: Close the inside park road in Grand Teton National Park to snowmobile use to allow for greater opportunity of non-motorized use of the Park. We would like to see the Teton Park Road (Grand Teton NP) changed from an ungroomed motorized trail to an ungroomed non-motorized trail.	
RESPONSE: See alternatives B, D, E-F and G.	
COMMENT: The Park should establish and enforce a prohibition against after-market exhaust systems that increase noise.	
RESPONSE: Current regulations require that snowmobiles operate at 78dB(A). The range of alternatives looks at lowering this standard to varying degrees (60dB(A) to 75dB(A) for machines that would operate inside the parks.	
COMMENT: The following principles must guide winter management: 1) Air and water quality must be protected and maintained at the highest levels possible; 2) The stillness and natural sounds of Yellowstone and Grand Teton in winter must be guarded from degradation; and 3) Wildlife must be protected during the critical winter season.	
RESPONSE: The commenter is referred to the discussion of the desired condition in chapter 1 of the DEIS. This discussion will be further clarified in the FEIS.	
COMMENT: Add warming hut facilities at Signal Mountain and Jenny Lake to provide for expanded visitor and interpretive services.	
RESPONSE: See alternative B and C.	
SUMMARY COMMENT: Allow only mass transit snow coaches in the parks. The trip should be offered for a modest fee to the visitor who is unable to ski or snowshoe but who wants to experience Yellowstone in the winter. An administrative mass transit system should also be considered. Snowcoaches must be monitored and controlled to prevent excessive disturbance of wildlife and to assure that total numbers of people and vehicles are not so high as to be unduly disturbing. Snowcoaches must also meet strict emission standards.	
SUMMARY RESPONSE: See alternative G. A discussion of administrative travel options will be added to the discussion of this alternative in the FEIS. A discussion of monitoring will be added to the FEIS.	
COMMENT: Within Yellowstone, both the North and West roads must be closed for winter use.	
RESPONSE: See alternative F.	
SUMMARY COMMENT: Please consider defining areas in Yellowstone where snowmobiles are and are not allowed.	

ALTERNATIVE FEATURES

SUMMARY RESPONSE:

All the alternatives presented in the DEIS define areas where snowmobiles are and are not allowed. Each alternative alters the area available to motorized recreation in some degree.

COMMENT:

The noise impacts from snowplanes are far greater than snowmobiles. It seems that either you should eliminate all motorized use on the lake or allow both types of use to continue.

RESPONSE:

The alternatives analyzed in the DEIS include the full range of management options available for motorized recreation on Jackson Lake.

COMMENT:

My chief criticism is that the NPS preferred alternative fails to prohibit recreational snowmobile activity. Please change this alternative!

RESPONSE:

The FEIS will identify a new preferred alternative that eliminates snowmobile use in the parks.

SUMMARY COMMENT:

Please provide more cross-country ski trails.

SUMMARY RESPONSE:

See alternatives B and C.

SUMMARY COMMENT:

Alternative B mentions limiting backcountry access in some areas to designated trails only (to protect geothermal areas and winter wildlife range). Looking at the map outlining these areas shows places that are clearly not geothermal or winter wildlife range. I also have concerns as to what a designated trail is?

RESPONSE:

The areas identified on maps of alternatives B, D, and E for YNP indicate wildlife winter range for one or more species. In delineating these areas there was an attempt to emphasize winter range for ungulates and species of special concern. Clarification of these winter ranges will be added to the FEIS. A refined definition of a designated route or trail will be added to the description of the alternatives in Chapter II of the FEIS.

COMMENT:

Eliminate backcountry trailing to retain a natural environment.

RESPONSE:

See alternative F.

SUMMARY COMMENT:

If the Continental Divide Trail were not relocated off of the highway then I would suggest that the trail be discontinued because of lack of interest and that the Potholes be reopened. Off-road trails, which can be used by snowmobiles in the winter and by bikers, hikers, etc., in the summer, should be established. An off-road trail system for both summer and winter use would be a great addition to our National Parks and at the same time would improve both summer and winter safety factors.

SUMMARY RESPONSE:

The Potholes area was not considered for motorized recreation because it is located in proposed wilderness and is inconsistent with 36 CFR 2.18. Relocating the Continental Divide Snowmobile Trail is a feature of alternative B.

COMMENT:

Don't groom the ski trails.

ALTERNATIVE FEATURES

RESPONSE:

The alternatives analyzed in the DEIS include a full range of management options available for nonmotorized recreation, both groomed and ungroomed, in the parks.

SUMMARY COMMENT:

This would be a perfect time to implement a policy that prohibits snowmobiles on open waters. It would be best to construct snowmobile trails away from rivers and other open waters.

SUMMARY RESPONSE:

Please see alternatives E-F for GTNP. Regulations in YNP prohibit oversnow vehicles except on groomed roadways.

SUMMARY COMMENT:

Phase in green machines.

SUMMARY RESPONSE:

See alternatives B and D.

SUMMARY COMMENT:

Require clean and quiet machines now or shorten the phase-in period.

SUMMARY RESPONSE:

At the time of the drafting of the DEIS the technology was not yet readily available to produce clean and quiet snowmobiles. Alternative G in the DEIS suggests a snowcoach only option for travel in the parks. The overall concept of alternative G was to require the cleanest mode of oversnow transportation available with existing technologies. Mitigation strategies will be added to some alternatives in the FEIS that examine the possible admittance of some snowmobiles currently available that have begun to use emission-reducing technologies.

COMMENT:

By beginning grooming operations immediately after the closure time, groomed roads will have the optimum time to re-freeze prior to the next days traffic. This should result in an improved visitor experience due to roads that stay smooth longer and also an increase in visitor safety since 16% of snowmobile accidents are due to "poor road conditions". [Vol. I, page 100] At no time, should grooming be allowed to occur during daylight hours because the disturbed snow is quickly re-disturbed by traffic and quickly results in deteriorated roads, which in turn have a negative impact on visitor satisfaction and safety.

RESPONSE:

This comment very nearly replicates the analysis of public safety under alternative F (page 276). A similar discussion will be added to the analysis of visitor experience under alternative F in the FEIS.

SUMMARY COMMENT:

It would be much better to close limited and specific areas where wildlife issues are a real concern. Limit or eliminate all entry, including entry by ski or snowshoe, into specific wildlife critical habitat areas. Winter range for ungulates is limited during the winter months and especially during heavy snowfalls. Impacts on these areas should be as minimal as possible. To prevent unnecessary winterkill, access to the geothermal area necessary for their survival should be limited. Limit off-trail backcountry use by skiers and snowshoers if additional protection of wildlife is required. Areas utilized for the purposes of oversnow vehicle use must be established a good distance from any wildlife wintering areas. Any winter snowmobile usage in either park should be kept in areas far away from ungulate herds, and any trespassing outside of these designated boundaries should result in the fullest prosecution allowed by law.

SUMMARY RESPONSE:

See alternatives B, E and F.

ALTERNATIVE FEATURES**SUMMARY COMMENT:**

A possible alternative would be to allow snowcoaches and a limited number of snowmobiles per day from mid-December until mid-February on a snow road to Old Faithful and then plow the road in mid-February to open it to private wheeled vehicles until April. Since February is when snowmobile traffic usually picks up again the added pollution and resource damage could be avoided by plowing the road at that time. I think the simple way to solve all of this is to open the park to unlimited snowmobiling from Wednesday 6:00 A.M. to Sunday 8:00 P.M. each week. All day Monday and Tuesday give the park, the critters, and personnel a rest.

SUMMARY RESPONSE:

The NPS appreciates your comment. Various components of your suggestion are already included one or more of the alternatives presented in the DEIS. For example, alternative C suggests plowing early and alternative G suggests a snowcoach only option. Other suggestions such as looking at specific times that snowmobiling would be allowed in the parks will be added to the discussion of mitigation strategies in Chapter II.

SUMMARY COMMENT:

Restrict to snowcoaches only for the winter season -- Mammoth to Norris, Norris to Canyon and Norris to Madison. Snowcoaches and snowmobiles could share West Gate to Madison, Madison to Old Faithful, Old Faithful to West Thumb and Canyon to Lake. We could restrict to snowmobiles only for the winter season -- East Gate to Fishing Bridge Lake to West Thumb and West Thumb to South Gate. If snowcoaches continue to use the South Entrance they should be restricted to their current schedule of southbound in the morning and northbound in the afternoon to avoid conflict with snowmobiles. Shifting snowmobiles to the east side route to Canyon would give riders a long open stretch to ride without snowcoaches present. Between West Thumb Lake and East Gate there would be less chance of resource damage, as there are few geothermal features or inviting off-road areas. It would also provide for a quieter snowcoach ride from Madison to Canyon by way of Norris. To reduce conflict on the West Gate to Old Faithful route snowcoaches could be permitted in the gate starting at 7:30 AM and snowmobiles could be permitted only after 8:30 to 9:00 AM. Snowcoaches could be required to be back to West Gate by 4:00 PM to avoid the snowmobile "Rental Return Rush" that occurs daily between 4:00 and 5:00 PM.

RESPONSE:

Several components of your suggestion have or are already included in one or more of the alternatives presented in the DEIS. Alternative G eliminates all snowmobile use and uses a mass transit snowcoach transportation system. Alternatives B and C divide the park by mode of transportation. Alternative C adds a temporal component, by separating transportation modes during a portion of the winter season. In terms of issues and impacts, NPS saw no reason to have an additional alternative that splits the park into use zones by transportation type. It would be a function of adaptive management in alternatives B and E, or the determination of some significant impact at a later date to determine if this additional division of transportation modes is necessary.

SUMMARY COMMENT:

The surface of Jackson Lake should not be closed to oversnow vehicles of any kind.

SUMMARY RESPONSE:

See alternative A and C.

COMMENT:

The Fountain Flat freight road should be reopened to over-snow access.

RESPONSE:

See alternatives C, D, and G.

SUMMARY COMMENT:

Immediately eliminate snowmobile use in the Potholes and Jenny Lake areas of Grand Teton NP.

SUMMARY RESPONSE:

See alternatives B, C, E-F and G.

ALTERNATIVE FEATURES

COMMENT:

The Sierra Club supports comprehensive baseline sound level monitoring and source inventories in all NPS units, including YNP, and the establishment of appropriate noise standards.

RESPONSE:

A discussion of proposed monitoring program, a feature common to all alternatives, will be included in the FEIS.

COMMENT:

This advisory committee would also make recommendations to NPS regarding a phasing and implementation schedule for new mobile emissions standards when they are developed by EPA, as well as advise NPS in the development of new sound requirements for all oversnow vehicles for YNP, GTNP and the Parkway.

RESPONSE:

See alternatives B and E.

COMMENT:

Under the Yellowstone National Park specifics of Alternative B, bullet seventeen states the Park Service can close down areas of the park if human exposure is damaging wildlife or other natural resources. Some sort of guiding limits should be stated to help officials decide when to close an area.

RESPONSE:

A clarification and discussion of adaptive management and monitoring will be added to the FEIS.

COMMENT:

Allow a string of huts for snowshoers and skiers.

RESPONSE:

Several of the alternatives presented in the DEIS suggest the construction of new or the refurbishing of existing warming huts in the parks. These new warming huts generally serve the frontcountry and are strategically located throughout out the parks to offer the greatest benefit to both motorized and nonmotorized users. Yellowstone Expeditions offer a yurt camping experience near Canyon in YNP. In order to offer additional backcountry experiences the new construction would necessarily occur in recommended wilderness. In terms of issues and impacts, NPS saw no reason to construct a series of new huts. None of the alternatives would specifically prohibit such an action in Yellowstone.

COMMENT:

Require that all rental snowmobiles be required to meet the tightest emissions standards for both air and noise that are technologically achievable for each upcoming year.

RESPONSE:

Because the majority of rental snowmobiles are rented outside the park (like rental cars) and not under permit from the NPS it would be difficult to require specific emissions for this group of snowmobiles and not all others. Alternatives B and D suggest that all snowmobiles entering the park meet strict emission and sound requirements.

ALTERNATIVE FEATURES

SUMMARY COMMENT:

With the construction of Cascade and Dunraven Lodges at Canyon already complete they could be opened for winter use and there would not be a need for a new warming hut at Norris just 12 miles away. Opening them in winter would also provide overnight lodging for skiers and thus a quiet experience for early mornings and late afternoons. The yurt camp already present should remain and perhaps Yellowstone Expeditions might consider a similar camp at or near Old Faithful perhaps at Goose Lake on the old Fountains Flat Dr. This could fulfill the campsite requirement for plan C and yet not have unnecessary impact due to unescorted campers. Skiers at Tower Junction would definitely appreciate a new warming hut. The current skier shuttle is barely used most likely due to a person's worry of waiting in the elements for the bus to arrive. If the old Madison or Tower warming hut were to be relocated to Tower junction more people might consider using the existing shuttle bus, which could eliminate the current overflow-parking problem at Tower. Facilities at Madison Junction should be expanded to include new restrooms with at least 10 stalls for women and a larger more permanent warming hut with a concession staffed by at least 2 to 4 people. Such expansion would also benefit summer tour busses as most busses stop at Madison already for its flushing toilets and running water. A Yellowstone Association bookstore and a small Visitor Center in a winterized structure would also be beneficial at Madison considering the flow of traffic in from the West Gate. With new facilities constructed at Madison Junction the opening of existing structures at Canyon and the relocation of an existing structure to Tower Junction the winter facilities needs could be adequately met. I urge the Park Service to expand both facilities and personnel at Yellowstone and Grand Teton. There are several lodging facilities, which should be open in the winter, and this would spread the visitors throughout the park creating a better experience for all concerned.

SUMMARY RESPONSE:

Alternatives B, C and D suggest building a warming hut at Norris Junction. Opening new facilities at Canyon would do little to eliminate the need for this warming hut which would provide ranger contact and interpretive facilities and toilets to winter travelers. The need for a new yurt camp has not been identified. The NPS appreciates your suggestion to relocate one of the existing facilities to Tower Junction and agrees that a warming hut is needed there. Many of the suggestions here are site-specific implementation strategies and are not appropriate for inclusion into the FEIS.

SUMMARY COMMENT:

Perhaps the best way to get a handle on the current pollution issue would be to have the Montana Department of Environmental Quality do a model projection of how many snowmobiles could be allowed into Yellowstone National Park and still maintain acceptable air quality standards. Upon completion of this model, it may be necessary to cap the number of snowmobiles allowed into Yellowstone each day at the level deemed acceptable by the Department until such time as the manufacturers are successful in their endeavor to provide cleaner, quieter snowmobiles. At that time, the numbers could be allowed to grow under continued monitoring by the Montana Department of Environmental Quality so that air quality standards are maintained. Monitor air quality and then close the park when use causes air to get bad.

SUMMARY RESPONSE:

One of the standards that will be monitored under all alternatives is air quality. While modeling efforts by the State of Montana are invaluable to the NPS the outcome of the monitoring and modeling programs should be only one of the criteria used to determine carrying capacities for the parks. See response below.

SUMMARY COMMENT:

I support amending the preferred alternative to include total prohibition of snowmobile activity in Yellowstone, Grand Teton and John D. Rockefeller Parkway!

SUMMARY RESPONSE:

Due in part to the lack of support for the preferred alternative as described in the DEIS a new preferred alternative will be identified in the FEIS.

SUMMARY COMMENT:

I urge you to make that management number dynamic, [snowmobiles] based on the weather systems that make even a smaller number of machines have a greater impact.

ALTERNATIVE FEATURES

RESPONSE:

Establishing visitor carrying capacities is an extremely complex task. Many commenters suggested that natural resource parameters (like weather systems or air quality) be used to establish visitor carrying capacities for winter use in the parks. This solution appears perfectly reasonable on the surface but would be quite problematic to implement. Most processes for developing carrying capacities set standards for a variety of visitor experience and natural resource conditions and then manage for those conditions through a lottery or reservation system. The reason that managing for resource standards on a daily basis would be problematic is that it would not allow visitors any degree of certainty when planning their park visit. For most people, traveling to the Greater Yellowstone Area is an expensive trip and the NPS does its best to keep emergency closures to a minimum. Managing by permit, reservation or lottery adds an element of uncertainty to trip planning for both visitors and businesses in gateway communities.

COMMENT:

After purchasing fuel and oil in the park that is not blended, our emissions limits are decreased again. It does not make any sense to me why the Park Service would put this restriction on us and not clean up their own equipment!

RESPONSE:

See alternatives B, C, D, and F.

SUMMARY COMMENT:

May I suggest horseback or horse drawn sleds, maybe even a battery-powered vehicle like "golfers" for the disabled or dogsledding.

SUMMARY RESPONSE:

One of the primary issues raised during public scoping was the need to eliminate conflicts between skiers and snowmobiles and snowcoaches who use the same road surface. Adding additional modes of transportation on the roadways would exacerbate rather than alleviate this issue. Eliminating all other modes of travel and allowing only horse and dogsledding would be problematic because of the long distances to destination areas in the parks. Travel by dog sled would do little to address wildlife harassment concerns.

COMMENT:

Alternative G might be more palatable to snowmobilers if it included a phase out period of individual snowmobiles (moving from current 2 stroke to cleaner, quieter new technology snowmobiles).

RESPONSE:

Alternative G includes a phase out period for snowmobiles. Alternatives B and D suggest a phase in of clean and quiet machines.

COMMENT:

Warming huts should be added to the route between West Yellowstone to Old Faithful at selected points to facilitate visitor exploration of geyser basins and other features at snowcoach stops.

RESPONSE:

Several alternatives for YNP propose the construction of a new warming hut at Norris Junction. As needs are identified for additional warming huts at other locations they will be assessed and the benefits of these new huts to visitor experience will be weighed against the potential adverse impacts on wintering wildlife and sensitive thermal areas. Currently a need for additional warming huts other than those currently proposed in the range of alternatives has not been identified.

COMMENT:

Do not change your off-trail backcountry use by skiers, snowshoers, or non-mechanical hikers.

RESPONSE:

See alternatives A and C.

ALTERNATIVE FEATURES**COMMENT:**

I believe it is appropriate that all motorized vehicles entering the Park be subject to the same EPA emissions and noise regulations as standard automobiles. I recommend that these standards be phased in over a six-year period to allow the snowmobile manufacturer's (sic) time to comply with the regulations. The snowmobile manufacturers would be allowed 2-3 years to develop this engine, and another 2-3 years to sell these EPA regulated machines. At that time, the NPS would stipulate that after a certain date, only EPA approved snow machines would be allowed into Yellowstone National Park.

RESPONSE:

The emissions standards suggested in alternatives B and D suggest phasing in stringent emissions and sound standards for oversnow vehicles. The standards are different than those of automobiles because 2-stroke engines operate quite differently. A feature common to all alternatives would require that once the EPA has established emissions requirements for snowmobiles that those requirements would be implemented in the parks. The discussion of EPA requirements will be clarified in the FEIS.

GENERAL RESPONSE TO THE FOLLOWING COMMENTS:

Many people focused on the features of comments that they favored and many focused on those features to which they were opposed. While this information is important to relay to decision makers it does not warrant a formal response under CEQ regulations (see §1503.4). Other commenters repackaged various existing alternative features into new groupings, or formed their own "preferred alternative" from the range of alternatives in the DEIS. Again, this information while, important to the decision maker, requires no further response under NEPA. The reason behind this determination is simple. In the final selected alternative, a decision maker is free to mix features from the full range of alternatives analyzed in the FEIS. This mixing can occur as long as the mixed features are consistent and the effects of such an alternative would not fall outside the range of effects disclosed in the analysis. Thus, presenting a remix of alternative features as a new alternative would be redundant and serve no analytical purpose. All the alternative features presented in the DEIS remain available for selection by the decision maker. These suggestions are not responded to individually but are provided here as information for the reader.

COMMENTS:

Drawing on elements of DEIS alternative F and G, the "Citizens' Solution" for Winter Access to Yellowstone," and the "Natural Regulation Alternative" submitted by the Fund for Animals, The Humane Society of the United States recommends that the NPS: ban the private use of snowmobiles in Yellowstone National Park and on the Continental Divide Snowmobile Trail in Grand Teton National Park (alt G); close to all traffic the roads from West Yellowstone to Madison, Madison to Norris, Mammoth Hot Springs to Norris, and Madison to Old Faithful during the winter months (alt F); close the east entrance of Yellowstone Park and end the use of explosives for avalanche control (alt D); plow the road through Yellowstone Park from Gardiner to Cooke City, Highway 26/89 within Grand Teton National Park (all alts), and from the Moran Entrance Station to Colter Bay Village; groom other park roads for use by snowcoaches (alt G) during daylight hours only; and monitor the effects of road closures on wildlife movements (all alts) shorten the length of the winter season to run from mid-December to early March (alt F).

I strongly support amending the preferred alternative to include a total prohibition on snowmobile activity throughout YNP and GTNP and the Parkway.

If the travel restrictions under the Preferred Alternative are admittedly ineffectual, they should be revised as per the restrictions under alternative F.

Alternative F does not, however, address a carrying capacity or explicit reductions in pollution, noise, numbers of snowmobiles, or other factors that lead to the disturbance of the natural setting and disturbance to wildlife. With these factors included into a revised Alternative F, it may become a viable alternative.

If this plan [alternative B] were to reduce the number of snowmobiles in addition to the reduced emissions/sound, promoted the use of snowcoaches, and closed certain trails to motorized use, this alternative would be the best one.

Combination of alternatives D and E---I feel that these alternatives, when combined, offer the best situation for man and nature. It allows the snowmobiles and other winter travelers to continue to use the park during the winter season while providing adequate protection for the wildlife and ecosystems involved.

Comment: This alternative [G] has merit, and could be improved by allowing snowmobile access if the machines meet strict Park standards for noise, speed and emissions.

ALTERNATIVE FEATURES

Alternative G; this is a good alternative but not by itself. It emphasizes clean quiet modes of travel using technology available today. This alternative should be combined with alternative E.

I think that a combination of these two would benefit YNP the most. Alternative B would require reduced motorized impact on the park, and provide ongoing research to benefit the environment. The primary emphasis in alternative E is the protection of wildlife and other natural resources.

I think that a combination of several of the proposed alternatives is the best solution to winter transportation problems in Yellowstone.

A combination of alternatives B (with it's oversnow vehicle regulations), D (with it's strategic visitor and use concentrations), and E (with it's wildlife and natural resource protection ideas), would be ideal.

Alternative M: Actions for YNP - Improvement of affordable access to the park interior by wheeled vehicles (alternative B), - Plowing the road from West Yellowstone to Madison and Madison to Old Faithful to provide affordable access (alt. B) - Offer shuttle buses to Old faithful to address air quality concerns (alt. B) - close roads from Madison to Norris and Norris to Mammoth to all travel. All no grooming of these routes (alt. F) - Keep other road segments open to oversnow motorized travel (alt. F) - Provide better visitor service, increase the size and number of warming huts, and other day use facilities (alt. F) - Shorten the length of the winter use season to the period from mid-December to early march (alt. F) - Creation of wildlife viewing areas in places where they do not come into direct contact with the wildlife. Actions for GTNP: Should stay the same as they were addressed in Alt E.

The draft acknowledges, however, under alternative F, to restrict skiing to front-country designated trails, keeping the backcountry prohibited to use. This would be a beneficial addition to alternative B.

I feel the best alternative would be to combine alternative E and Alternative F because it would restrict the use of winter sports activity to what is considered non-essential range for most species, while coming under constant scrutiny and change if ecosystems are affected.

Oversnow vehicle sound emissions level to be at or less than 60 dB(A). If it is possible to reach this level for alternative D, it could be included in alternative B also.

Please consider modifying alternative B by removing the plowing of the road from West Yellowstone to Old Faithful (like in alternative D).

Shorten the length of the winter season slightly, as proposed in Alternative F, to run snowcoaches as proposed in Alternative G (from Dec. 15 to Mar. 1). This allows for both a lengthy winter season for human visitors (by snowcoach or ski/snowshoe) and also allows for a quiet period in late winter/early spring when bears and other wildlife are emerging or particularly taxed.

Omit the road plowing, the 10 foot drifts on the side of the road will allow no one to see anything anyhow. Do not increase the length of motorized trails in the Park beyond their current levels. This will only encourage more people to come to the Park and reduce the enjoyment for all. Maintain the length of the open season at current levels for the same reasons provided in 2. above. Reduce night speeds to 35 mph to prevent the killing and maiming of animals by uncaring snow machines users. Reduce the noise associated with each machine to the level of best current technology. If 60 dB is attainable so be it. 6. Reduce emissions from machines to the level capable by current technology. Limit the number of visitors allowed into the Park on a daily basis. Select some level and stick to it. This should not be an average daily maximum because almost all the visits occur on Saturdays and Sundays.

I would support a combination of alternatives F and G, that would eliminate snowmobile traffic from the majority, if not all, of Yellowstone and Grand Teton, close the East entrance and protect sensitive areas and wildlife from visitor impacts.

The use of Colter Bay as a trailhead and snowmobile staging area proposed in alternative F would be a good idea if it includes keeping the surface of Jackson Lake open and allowing snowmobiles access onto the lake at that point as proposed in alternative A.

Would like to see the advisory committee as designated by alternative E incorporated into alternative F.

I sincerely hope you consider and adopt the better elements of the two alternatives, G and F, in drafting the final EIS.

So my vote is for alternative E, alternative F, or a combination of those two.

Plans E and F would provide if they were combined into one.

ALTERNATIVE FEATURES

EXPRESSIONS OF SUPPORT

GENERAL RESPONSE TO THE FOLLOWING COMMENTS:

In general, the tenor of these expressions of support and opposition appear to relate to the decision that the commenter would like to see NPS make. The commenter's opinions will be considered in making the final decision, but there is nothing in those opinions that substantively would alter the range of alternative features to be evaluated in the Final EIS. For example, if the features that are not supported were to be deleted from the range of alternatives then the analysis would be left only with features that the commenter agrees with. If only the actions that are supported by the commenter remain, then there is effectively only one alternative. Accordingly, the commenter concludes that there is only one alternative that warrants consideration. From the NEPA standpoint, the analysis cannot be limited in this fashion. Therefore, expressions of support or objection will not be responded to, in general, by changes in alternative features -- they are listed here for the readers information.

COMMENTS:

I support your preferred alternative suggestion of eliminating snowmobiles from the inside Teton Park Road.

I strongly support amending the preferred alternative to include a total prohibition on snowmobiling.

I support the preferred alternative, with the addition of plowing Mammoth to Madison, and restricting travel on plowed roads to public transportation.

Alternative F is the only alternative to offer what the NPS is trying to get at here and misses for the blinders. This alternative closes pending study parts of the park to use. This is what should be done in the first place if damage to the resources is in question.

My preference is for option A. A modified B with local approval of all alternatives within that option.

So my vote is for alternative E, Alternative F, or a combination of those two.

I support the citizen's alternative.

I support alternative E.

I can support the revised alternative plan E of the cooperating agencies except for the provision of snowmobiles on Jackson Lake and unlimited snowmobile access from four connecting entrances.

I support alternative G.

I support alternative F.

I support "revised Alternative E".

I also agree that all snowmobiles private and rental, burn gasohol and use synthetic oil while in the park.

IMPLEMENTATION STRATEGIES

GENERAL RESPONSE TO THE FOLLOWING COMMENTS:

The following comments represent suggestions for ways to implement many of the management actions that have been presented in the range of alternatives. These types of suggestions are useful in that they provide ideas for the decision maker for how the eventual decision could be implemented. The winter use plan programmatically will direct the types of use that are appropriate relative to constraints or standards that are part of the FEIS alternative (or alternative feature) that is selected in the decision. This includes limits on sound or emissions, and locations that are closed or open, and phase-in periods. Within that context, later implementation will consider how to allocate use to outfitters, guides or concessions, how park administration must change, and other "how to" kinds of details. Some details may be spelled out in the decision to be made, others may require additional site-specific analysis. Because these suggested activities do not require analysis in this programmatic EIS and plan they will not be addressed further but are provided here as information to the reader. Many such features could facilitate management or address routine management issues under any of the alternative plans represented in the EIS.

COMMENTS:

With snowcoach travel only under The Citizen's Solution, schedules should be published and adhered to.

ALTERNATIVE FEATURES

Take some of the money you will save by grooming less, or take a percent of the entry fees, and offer FREE Yellowstone vacations to a specified number of families in low income brackets who apply by lottery. You could provide free entry, free transportation by snowcoach, and three nights free stay and \$500 worth of gas vouchers-whatever it would take to even the playing field for these people. Snowmobile clubs would probably do fund-raisers to provide these scholarships to families in their states. Divert funds that would have been used for plowing to convert snowcoaches to clean and quiet.

I like the idea of a shuttle bus from West Yellowstone to Old Faithful. I do think that this would cut down on crowding and traffic, but \$20-\$25 is not a low cost. That price seems to be fairly expensive. I think \$15 maximum would be reasonable but still high.

The proposed establishment of any advisory committee fails to include a nonmotorized representative. We [Rexburg Chamber of Commerce] would not be opposed to having a representative on your committee representative of the Chamber of Commerce. Please let us know if this is possible

Affordable access is a cornerstone of our national park system. Winter visitation to Yellowstone and Grand Teton, is by its nature, more costly than summer travel. There is room, however, to make snowcoach trips more affordable. Funds to do so may come from savings accrued from altered winter management such as closed fuel dumps and less frequent grooming, the fee user program or other park budget appropriations, or federal and state grants which support cleaner transportation systems.

Since snowmobilers have been careless and reckless, they should have to pass safety and education programs. These can be administered and paid for by snowmobiler groups.

In many urban areas, vehicles are required to undergo an emissions "smog check" as a condition for license and registration. Why not impose a similar program for use in Yellowstone? Such a program would have the advantage of being self-supporting, either by contracting to an outside agency, or by imposing fees to support NPS provided testing stations. An additional source of revenue would be to spot check machines and issue citations within the park.

Limit the number of machines entering the park on weekends and holidays.

Specific to alternative B, I would 1) add surveys on the disturbing impacts of noise not only on wildlife, but on the visitor experience; 3) phase out use of two-cycle or diesel vehicles of any kind, including vans, busses, or trucks, including NPS ones, and prohibit idling of any engine of a parked vehicle except for a short defrosting period (with a drive in attendance) in the morning.

I suggest having low emission snowmobiles and paint them a certain color and only allow them in the park

Control visitation and impacts through increased regulation such as increased fines, no idling, use limits, safety programs, limit fuel, licensing track size and overall time allowed in the parks.

With a new, improved route for the CDST, commercial snowmobile outfitters should be permitted access to this new trail segment, which will help disperse use out of YNP and onto National Forest trails maintained by the state of Wyoming. Since use numbers are controlled by both NPS and the USFS through outfitter permits, use numbers can be closely monitored and controlled to avoid over-utilization by outfitters.

Governors to restrict speed should be placed on all snowmachines entering the park.

A key group absent from this [Advisory] committee is a representative of the human-powered outdoor recreation community.

Involve the public in advisory committees noted at the beginning of the alternatives plan. If these community members are the major players in determining levels of noise and air pollution, then their involvement will likely reduce their complaints.

A suggestion to make the passes visible and to ensure people are buying the passes may be to use an attachable wristband type device currently used for concerts and other events to identify who has paid for admittance. This could be attached to the snowmobile around the handlebars for out of state visitors there for a week (in most cases), or to the person for the one-day rental snowmobile or snow coach visitor. These bands are very durable and the colors could be changed every week to ensure that people aren't obtaining their own to bypass the system.

ALTERNATIVE FEATURES

In order to ease the economic transition for business owners in gateway communities, Park Service contracts for snowcoach operations should be offered preferentially to locally owned businesses who have relied on snowmobile business in the parks. Small Business Administration (SBA) loans should be explored and the Park Service should facilitate when possible.

Make the tour people responsible for all accidents their clients are involved in. Limit them to either 5 clients per guide and 2 tours a day.

Grandfather personally owned snowmobiles with regard to emission standards in Yellowstone National Park.

COMMENT:

Implement reservation or lottery systems to limit visitor use.

RESPONSE:

All alternatives include the determination of a visitor carrying capacity. Once that capacity is established and exceeded management actions such as reservation systems or lotteries could be used to implement the process.

COMMENT:

I think there should be a fee structure that rewards snowmachine users who bring in quieter 4-stroke machines and not noisy racing machines with high powered 2-stroke engines.

RESPONSE:

The NPS appreciates the commenters suggestion. This idea could be an important implementation strategy, particularly when applied to outfitters and guides who operate under permit to the NPS. The current fee for private snowmobiles is 15.00 per vehicle. It is unlikely that a reduction in this minimal fee would result in the type of wide scale transition to 4-stroke snowmachines that would be necessary to effect a noticeable change in the parks.

Mitigation**SUMMARY COMMENT:**

Either allow equal 12 hour shifts, place some parts of the park off-limits to snowmobilers, or create noise-free use days when no snowmobiles are allowed.

SUMMARY RESPONSE:

Mitigation strategies, which look at limiting snowmobiles to certain times of the day, will be added to the FEIS.

SUMMARY COMMENT:

It is also important not to disrupt the natural ebb and flow of wildlife by plowing a road to Old Faithful. However, if this becomes a necessity, I suggest the road be limited to a short window of use per day - a lunchtime tour, or something to that effect.

SUMMARY RESPONSE:

Mitigation strategies will be added to the FEIS limiting the operation of some types of vehicles to certain hours of the day when their effects on wildlife could be minimized. Under alternatives B and C the effect of habitat fragmentation caused by plowed roads will be somewhat mitigated by the plowing of escape routes or snow ramps.

COMMENT:

Any ban on snowmachines must include a comprehensive effort by the NPS to work with federal and state land managers outside the boundaries of the Parks. Such a cooperative effort should make sure that use on groomed trails is restricted in order to minimize opportunity for illegal access to the Park.

RESPONSE:

Several alternatives suggest coordination with local communities and agencies to improve safety and information programs for park visitors. Alternative G will include a monitoring program and your suggestion will be incorporated as a mitigation strategy under alternative G in the FEIS. However it is outside the scope of this EIS to suggest that groomed trails outside the parks be restricted in any way.

COMMENT:

Snowmobile renters should be required to travel with a guide or outfitter.

ALTERNATIVE FEATURES**RESPONSE:**

This suggestion has been added to the discussion on mitigation in Chapter II of the FEIS.

COMMENT:

Since the government has allowed these activities in the past, these businesses should be compensated for policy changes.

RESPONSE:

The NPS appreciates your comment. Whatever the final decision resulting from this EIS might be, the NPS will make every effort to ensure that any transition is smooth and causes the least possible economic impact to all concerned.

COMMENT:

Serious consideration should be given to placing gates or cattle guards or both at key locations to prevent buffalo from taking roads out of the park in Yellowstone.

RESPONSE:

Bison travel in and out of the parks in a variety of locations. Numerous bison exit the park from other areas, including traditional migratory corridors. Unfortunately this type of mitigation would not prove effect in preventing bison from exiting the park.

COMMENT:

Move entrance booth to a more open area.

RESPONSE:

This suggestion will be added to the mitigation section of Chapter II in the FEIS.

COMMENT:

It would be better to decrease at least 50% the use of the greater polluters namely snowmobiles

RESPONSE:

Mitigation will be added to Chapter II in the FEIS that suggesting that under certain alternatives the number of snowmobiles in the parks be reduced until carrying capacities are established.

COMMENT:

The old Bombardiers are really no less noisy than your average snowmobile and could be phased out over time.

RESPONSE:

See alternative G.

COMMENT:

It should be taken into account the areas where these wetlands are most extensive and access to these areas should be limited.

RESPONSE:

Oversnow motorized access to the parks is limited to designated road corridors and the frozen surface of Jackson Lake. None of the alternatives presented in the FEIS would require a change in that regulation.

COMMENT:

The only change I would like to see is access from the east gate equal to the others throughout the winter season, not just Presidents day and Super Bowl Sunday.

RESPONSE:

In six of the seven alternatives the East Entrance road remains open for oversnow travel. There are no restrictions placed on the numbers of snowmobiles that could enter from the East Entrance under alternatives A, B, C, E, F, or G.

ALTERNATIVE FEATURES**SUMMARY COMMENT:**

Require all west gate entrance passes to be pre-purchased at local outlets or at the Public Lands Information Center in West Yellowstone. Promote the sale of these pre-paid passes at all other entrances.

SUMMARY RESPONSE:

Pre-paid passes are available in West Yellowstone. Should the need arise at other gates for the same reasons, the service could be expanded. The rationale for this measure -- mitigating pollution impacts on visitors and employees -- has a cost associated with it. Opportunities for necessary NPS/visitor contact at the gate are lost. Suggesting that all visitors forego an important safety element of the park experience, so that their snowmobiles will be less polluting is clearly not in compliance with 36CFR 2.18. The regulation states that snowmobiles are prohibited except where designated and only when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations and will not disturb wildlife or damage park resources. In this case, mitigating an effect on park values and resources by completely eliminating an important information and safety resource for park visitors is illogical. Voluntary compliance with this management option is reasonable, but only for those visitors who wish to use it.

COMMENT:

Winter use levels should not exceed the previous six years' average until analyses of carrying capacity are conducted. No expansion of winter services or facilities should take place in the ensuing period.

RESPONSE:

Interim carrying capacities will be added to several alternatives as mitigation. A resatorium on the expansion of winter facilities will be added to alternative D as a mitigation strategy.

COMMENT:

Make a class mandatory to review procedures and behavior aimed at reducing impact on wildlife. This could be an annual process for repeat winter park users by using a permit. This should be under the control of the NPS and not the vendors.

RESPONSE:

This suggestion will be added to mitigation strategies listed in Chapter II of the FEIS.

Range of alternatives**SUMMARY COMMENT:**

Properly conceived the range of alternatives should have been one that kept all park units the same with the restrictions for sound and emissions; one that plowed the roads; one that would curtail use to a level that the resources of the park could survive over the long term; the mass transit alternative; one that would allow current use to continue but phase in the most restrictive measures.

SUMMARY RESPONSE:

Please see Chapter II of the DEIS. All alternative features suggested by this comment are included in the range of alternatives analyzed in the DEIS. A more detailed explanation of mitigation strategies and carrying capacities will be provided in the FEIS.

SUMMARY COMMENT:

The range of alternatives analyzed should include: (1) a true "no-action" alternative and a non-motorized alternative

ALTERNATIVE FEATURES

SUMMARY RESPONSE:

The primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the Act [NEPA] are infused into the ongoing programs and actions of the Federal Government (§1502.1). "The range of alternatives discussed in an [EIS] shall encompass those to be considered by the ultimate agency decision maker (§1502.2 (e))." The purpose and need for action described in the DEIS is sufficiently broad to act as an action-forcing tool. It is within the discretion of the decision maker to set the scope of analysis. Considering that motorized use in the Parks is an existing use, not a proposed use, it is logical to frame the purpose and need in terms that would include that use and facilitate an incremental investigation of the impacts of that use. Several of the alternatives presented in the EIS suggest closing areas of the park to all human use. In terms of issues and impacts the NPS saw no reason to suggest further closures. Under alternatives B and E, if future monitoring were to indicate that closures were necessary, then additional areas of parks may be closed utilizing the adaptive management process.

Clarification**COMMENT:**

Keep the forest fires to a bare minimum.

RESPONSE:

Forest fires have not been identified as an issue or concern to be addressed by the winter use plan and are outside the scope of analysis.

COMMENT:

Build a monorail or gondola

RESPONSE:

Please see page 38 of the DEIS. Although the benefits of this alternative might eventually prove to be substantial the implementation costs would be enormous. Because a monorail or train system would be a year round improvement and not strictly a winter use issue it would best be addressed in a general management plan.

COMMENT:

Purchase or lease a winter range for wildlife

RESPONSE:

Although the benefits of this alternative might eventually prove to be substantial the implementation costs would be enormous. Because the purchase of additional parklands would be a year round improvement and not strictly a winter use issue it would best be addressed in a general management plan.

COMMENT:

It is an excellent concept to establish the carrying capacity for various human uses of the Yellowstone and Grand Teton National Parks and the John D. Rockefeller Memorial Parkway, but the NPS would be remiss if it does not consider establishing carrying capacity for wildlife as well.

RESPONSE:

Establishing a carrying capacity for either wildlife or human beings is a lengthy and complex process. Carrying capacities for humans can be addressed seasonally, but carrying capacities for wildlife cannot. For this reason wildlife carrying capacities are best handled in a natural resource management plan.

COMMENT:

The present road system has to be replaced with a modern 4-lane system that will allow safe and easy transit.

RESPONSE:

The implementation costs and natural resource impacts of such an alternative would potentially be enormous. Because four-lane road system would be a year round improvement and not strictly a winter use issue it would best be addressed in a general management plan.

COMMENT:

The Park not be closed seasonally and Snow Lodge and Mammoth Hotel and potentially other lodging be kept open year-round.

ALTERNATIVE FEATURES**RESPONSE:**

The parks close seasonally for several reasons. First, in order to allow enough snow to accumulate on park roads for grooming and snowmobiling to begin the parks must close to automobile traffic (and cease plowing operations) in the fall. Alternatives B, C, and G, which propose alternate modes of transportation, suggest longer use seasons in some sections of the parks. In the spring the parks must close to allow road plowing to begin so that the parks can be open for automobiles. In the spring, some areas of the parks contain critical habitat for grizzly bears as they emerge from their dens. These areas must be closed during this period.

COMMENT:

Examine possible alternatives such as possibly a system of warm-up huts along the many miles of groomed trails in the national forest could be organized snowmobiles should not be allowed, as a form of compromise, to ride in on the Cook City highway to the northeast entrance.

RESPONSE:

It is outside the scope of this winter use plan to propose actions on national forest lands.

COMMENT:

I would like to see expansion of the park to allow for the swarm of visitors in the years to come, so that their effect on resources and wildlife is at a minimum.

RESPONSE:

Although the benefits of this alternative might eventually prove to be substantial the implementation costs would be enormous. Because the purchase of additional parklands would be a year round improvement and not strictly a winter use issue it would best be addressed in a general management plan.

COMMENT:

Reopen the other parks, so people closer to Glacier, etc. have someplace to go. If the problem is too many snowmobiles on the existing roads, then let people spread out and take their chances in the backcountry.

RESPONSE:

It is outside the scope of this winter use plan to propose actions in other national parks. Under 36 CFR 2.18 snowmobiles are limited to existing roadways which are also used in the summer for motorized travel. Creating new roads in Yellowstone would necessitate construction of roads in recommended wilderness areas. This action would not be in compliance with NPS policy and would not pass the criteria as stated in EO 11644 (as amended by EO 11989).

SUMMARY COMMENT:

Snowcoaches need to be regulated just like snowmobiles. Noise level limits if legislated should be uniform and encompass all motorized travel, big truck campers, tour buses, snowcoaches and snowmobiles.

SUMMARY RESPONSE:

The commenter is referred to pages 25 and 27 of the DEIS where oversnow vehicles are defined. This definition includes both snowcoaches and snowmobiles. The scope of the winter use plan and EIS is limited to the winter season. The analysis of the effects of these vehicles on the natural soundscape will be clarified in the FEIS.

SUMMARY COMMENT:

The trails that are used by snowmobilers should be repositioned in areas that would make it more difficult for the bison to leave the park. Develop some sort of gating device that will allow oversnow vehicles through on groomed roads (even if it requires a ranger on duty), and keeps the wildlife inside the park (even if this requires a team of rangers to haze them back in). Fence the entrance areas with bison proof fencing.

ALTERNATIVE FEATURES**SUMMARY RESPONSE:**

Repositioning trails in Yellowstone is not possible because snowmobile traffic is limited to the existing road corridor. Alternative F looks at closing two road segments where bison are most active. The commenter is referred to the discussion in Chapter III Affected Environment (p. 115-116) of the DEIS. This section of the document explains how bison move out of the parks in winter. To prohibit bison in Yellowstone from exiting the park it would be necessary to fence enormous portions. The negative effect of this fencing on wildlife populations in the greater Yellowstone Area would be great and would be contrary to the mission of the NPS. See Chapter I for a description of NPS mandates. This discussion will be further clarified in the FEIS.

SUMMARY COMMENT:

Feed buffalo in YNP when necessary to keep them from leaving the Park and from starvation.

SUMMARY RESPONSE:

The NPS, under the organic act makes every effort to maintain the natural systems within in the parks.

COMMENT:

Noise measurements should be used as a monitoring tool rather than an enforcement tool.

RESPONSE:

A section on proposed monitoring methods, standards and criteria (including sound) will be added to the FEIS.

SUMMARY COMMENT:

We suggest that you at least re-open the Frontier Cabins as a lower cost option for winter visitors. Affordable lodging at Old Faithful needs to be made available to the public. Please consider allowing the concessionaire to offer more winter lodging choices such as the hostel accommodations that were once upon a time contemplated when the new Snow Lodge was just an artist's rendering on the wall of the old Snowlodge.

SUMMARY RESPONSE:

Elements of the Plan analysis relate to other plans and analyses that are or have been ongoing. As other plans are approved elements of the Plan can incorporate relevant portions (see page 29 of the DEIS for a list of these plans). NPS agrees that affordable access is important. The NPS opened several of the Frontier Cabins during the season of 1999-2000 and will continue to explore options to make access to the parks more affordable.

SUMMARY COMMENT:

Why do snowmobilers have to stop at the entrance? -Government! Raise the local gas/room tax to pay for management and get the office drones into the field. Technology today could count the machines and the people, at 45 mph.

SUMMARY RESPONSE:

Pre-paid passes are currently available for purchase in the town of West Yellowstone and persons who wish to may purchase them and enter the park via an express lane that does not require a stop. As a detail of implementation there is no change in this procedure proposed in any of the alternatives presented in the EIS. It is important to note however that during the winter season weather can be extreme and unpredictable and many persons who enter the park have questions concerning safety, regulations, and availability of services. Numerous visitors have not operated a snowmobile before. To deny persons access to this valuable information source would not be in the best interest of the parks or the people who visit them.

SUMMARY COMMENT:

The FEIS should include more detail on the proposed adaptive management process including the mechanisms for public disclosure of the analysis and the decisions. The roles of the NPS, other Agencies, independent science, and the public should be clearly stated.

SUMMARY RESPONSE:

A section on proposed adaptive management monitoring methods, standards and indicators (including sound) will be added to the FEIS.

ALTERNATIVE FEATURES**SUMMARY COMMENT:**

We suggest that rather than plow the road, that the gas station at OF be moved between the visitor center and the road. The skiers can focus, on the cabin side of the new lodge and the snowmobilers focus while they're on the machines can be on the other side of the snow lodge.

SUMMARY RESPONSE:

One of the primary issues raised by persons who ski in the Old Faithful is the sound level and odor and visibility of snowmobile emissions. These are the primary issues that the road-plowing feature under alternative B was to attempt to resolve. It is unclear from your comment how relocating the gas station a few hundred yards would address these concerns.

COMMENT:

An alternative to allow lower income families to enter the park during winter, but not investigated by the DEIS, is to subsidize snow coach fares into Old Faithful which might be cheaper than plowing with its requisites for winter parking, which are also not addressed in the DEIS.

RESPONSE:

Regardless of the final decision the NPS will continue to explore options for affordable access. Plowing the road was suggested to address a range of issues raised during public scoping including air quality and sound.

COMMENT:

Roads that are left open should not be groomed. There is no reason that snowmobiles cannot use the roadway after it is plowed one time.

RESPONSE:

Snow roads, as a safety and resource protection requirement, are groomed in all alternatives. The overall numbers of snowmobiles entering the parks (as well as the number of novice snowmobile riders) make road grooming a necessity and proposing an alternative that eliminated grooming would not be reasonable.

COMMENT:

Grooming equipment should also be brought under pollution abatement requirements.

RESPONSE:

Emissions requirements as suggested in alternatives B and D refer to all oversnow vehicles. Further clarification of the definitions for these vehicles will be made in the FEIS.

COMMENT:

Immediately reduce human use in the Parks. The sewage system is not able to handle the number of people.

RESPONSE:

Recently Yellowstone has completed an environmental assessment on a sewage treatment facility at Old Faithful. Because these facility issues are year round concerns they are being addressed in separate implementation level environmental assessments (see 1508.18(B)).

COMMENT:

Parking should be spread covering a broader area around Old Faithful and using shuttles up to the geyser itself.

RESPONSE:

It is unclear what winter use issues the commenter is attempting to resolve with this suggestion. Although the effects of this alternative might eventually prove to be beneficial, implementation costs would be high. Because the construction of additional parking areas would be a year round improvement and not strictly a winter use issue it would best be addressed in a general management plan.

COMMENT:

The Jenny Lake Road should not be closed to snowmobiles. The main reason is that it currently provides the closest access point between Jackson and the Continental Divide Trail. If that trail is closed, then a new trail should be established on the east side of Snake River running from Jackson to Moran to link up with the Continental Divide Trail.

ALTERNATIVE FEATURES**RESPONSE:**

The NPS believes that the commenter is referring to the Teton (or interior) Park road in Grand Teton National Park. The Teton Park road remains open to snowmobiles in alternatives A and C.

COMMENT:

Change Yellowstone Park to a drive through park. Designate people areas and secure these areas from wildlife.

RESPONSE:

The majority of park visitors to Yellowstone experience it as a drive through park. In the wintertime this is particularly true, with statistics showing that about 20% of park visitors participate in skiing activities. To address impacts to wintering wildlife alternative F eliminates all backcountry skiing and also closes substantial portions (where wildlife is most abundant) of the park to human use.

COMMENT:

The EIS mentions on bullets 18 and 19 that roads will be closed and have a public comment period the 60-day comment period on the roads closure is not a good idea. This would create more conflict with in the park. I think that the NPS should step up and say this road is closed for this time and leave it at that.

RESPONSE:

This portion of alternatives B and D will be clarified in the FEIS.

COMMENT:

In the brief description of the area you say that the weather is the best towards the north entrance, so why not keep winter use limited to that area?

RESPONSE:

One of the reasons that many people visit YNP in the winter is to see the geysers and thermal areas in the snow. The majority of these areas are located nearer to the interior of the park. Most winter recreation activities require the presence of substantial amounts of snow. Snowfall, as noted in the climate section on page 8 of the DEIS is much greater and more reliable in the interior of the park.

COMMENT:

Approve motorized use for handicapped individuals only.

RESPONSE:

The NPS assumes that this comment refers to oversnow motorized use in the parks. All alternatives in the EIS were developed to provide equal access for all persons to the parks. All alternatives allow some level of motorized access by mass transit bus, automobile, snowmobile or snowcoach. Under any alternative that allows snowmobile access (which can be considered to be the most physically restrictive) snowcoach access is also permitted.

COMMENT:

I would also like to see other snowmobile routes throughout other areas of the park to lessen impact at key attractions.

RESPONSE:

See alternatives B and C.

SUMMARY COMMENT:

Higher entrance fees are needed.

SUMMARY RESPONSE:

One concern that the NPS has identified during public scoping is that a winter trip to the interior of the parks is quite expensive. It is unlikely that a higher fee (which is currently \$15.00) would deter those persons who can afford to enter the park on a snow mobile or snowcoach on any given day.

SUMMARY COMMENT:

Require that each operator have a valid state driver's license.

ALTERNATIVE FEATURES

SUMMARY RESPONSE:

All alternatives require that each operator have a valid drivers license.

COMMENT:

Where practical, providing trails alongside highways, where people do not expect clean air and quiet, would provide a place for these vehicles to run for fun without detracting from the quality of the experience of other park visitors.

RESPONSE:

This alternative was dismissed from further consideration because of safety reasons. Please see page 38 of the DEIS. Under 36 CFR 2.18 snowmobiles are limited to existing roadways which are also used in the summer for motorized travel. Creating new roads in Yellowstone would necessitate construction of roads in recommended wilderness areas. This action would not be in compliance with NPS policy and would not pass the criteria as stated in EO 11644 (as amended by EO 11989). See comment and response below.

SUMMARY COMMENT:

Off-road trails that can be used by snowmobiles in the winter and by bikers, hikers, etc. in the summer should be established.

SUMMARY RESPONSE:

See alternative B under Grand Teton NP. Establishing new roads in Yellowstone is difficult because the majority of the parks land area exclusive of the existing road corridors is recommended as Wilderness. Under NPS policy recommended Wilderness is to be given the same management protection as designated Wilderness.

COMMENT:

I think that all off-road snowmobile trails need to be closed, in particular the Continental Divide Trail needs to be closed in the winter.

RESPONSE:

Under existing regulation snowmobile travel in national parks is restricted to designated routes. There is no off-road snowmobile travel permitted in the parks. Alternatives E-F and G suggest that the CDST through Grand Teton National Park be eliminated.

SUMMARY COMMENT:

Please consider reestablishing a rail line into the park. It was originally intended to be accessed by rail and a rail line would eliminate long lines of air polluting cars, the necessity for parking space and the constant road repairs. Explore use of natural gas and horse drawn carriages in any case. Operators could make lots of money in ways that better fit the YNP experience.

SUMMARY RESPONSE:

Please see page 38 of the DEIS. Although the benefits of this alternative might eventually prove to be substantial the implementation costs would be enormous. Because a monorail or train system would be a year round improvement and not strictly a winter use issue it would best be addressed in a general management plan.

COMMENT:

The proposal in alternative C to lengthen oversnow access from the South Entrance to West Thumb by four weeks in March is of very limited value since there are no critical visitors services (food, gas, lodging) available at West Thumb. The proposal in alternative F to move the closing date from mid-March to early March is without justification.

ALTERNATIVE FEATURES

RESPONSE:

One of the issues raised during public scoping was a need for increased access to winter activities. In order to explore the effects (both beneficial and adverse) the NPS wished to propose in one of the alternatives that the winter season be lengthened in the spring. The options were limited by two factors: 1. The immediacy of snowfall during the spring; and 2. The need to protect critical grizzly bear habitat as the bears emerge from their dens. The only area of YNP that passed these criteria was the southern portion of the park. Therefore it was proposed as a feature of an alternative and its effects were analyzed. The summary of alternatives table is incorrect in stating that the extension is 4 weeks. The written text correctly identifies the season extension as two weeks. This error will be corrected in the FEIS.

The proposal to move up the closing date in alternative F was suggested to examine the benefits an earlier closure may have on emerging grizzly bears and as well as on other wildlife species during a time when the physical stress of the winter season is the greatest.

COMMENT:

If this alternative is chosen then the open or unregulated back country non-motorized use should be monitored closely for the first few years to be sure that the effects on the undulates is minimal and not causing unnecessary energy expenditures.

RESPONSE:

A discussion of monitoring standards, methods and indicators (including the elements suggested in the above comment) will be added to the FEIS.

IMPACT TOPICS DISMISSED**SUMMARY COMMENT:**

Pollution from vehicle exhaust contains a number of elements that are damaging to vegetation. While the amount of pollutants emitted by a 2-stroke engine are greater than those emitted by a 4-stroke engine, the elements in the emissions, except for the unburned fuel emitted by 2-stroke engines, are similar.

SUMMARY RESPONSE:

NPS does not dispute that pollutants from exhaust can damage vegetation. However, during the snowmobile season, plants are dormant and thus are not included in the analysis of impacts. An updated discussion and analysis of the effects of snowmobile emissions is included in the FEIS.

COMMENT:

Exotic species: Page 82, Analysis should be completed to determine the difference, if any, between uses for groomed trails or a plowed interior park road and the possible introduction of noxious weeds and their seed.

RESPONSE:

The dispersal of exotic species is a problem that accrues to year-round use in the national parks. On the whole, the portion of this problem potentially attributable to winter use is none to negligible, considering that the major dispersal agent is the use of horses from park trailheads and trailheads on adjacent public lands. Furthermore, because noxious weeds are dormant, generally buried under the snow, and not in seed during the winter use season, the issue of transportation of them in to the parks in the winter is moot.

GENERAL EXPRESSIONS OF CONCERN

Comments identified as General Expressions of Concern are not specific or substantive in nature, as defined in the CEQ regulations (§1503.3 and §1503.4). That is, they are not specific in regard to the analysis or the alternatives, and they do not address the adequacy of the Draft EIS, the merits of the alternatives, or provide additional relevant information that is within the scope of the purpose and need for action. They can generally be characterized as personal opinions on resources or park management, or other statements that would not be responded to by any change in the DEIS. It should be noted that for great many of comments that express general concern about resources or other impact topics, similar but more specific comments are recorded and responded to in their respective subject areas. Due to the large volume of comments, like statements are grouped as "summary comments" and actual examples are provided. Where a comment doesn't fit within a grouping, or is sufficiently different from other comments, it is stated in the original words of the commenter.

General Park Management-Mandate**SUMMARY COMMENT:**

Many people stated that snowmobilers have a right to access the parks, that they are concerned about park resources, that they observe the rules, and that the wonders of the park in the winter are especially enjoyable while snowmobiling. For example, "Snowmobilers are just as concerned about the preservation of the land and the well being of the wildlife as everyone else is." "Snowmobilers are environmentalists who really care about the land and wildlife, while enjoying a sport that brings families closer together to provide traditional family values." "We enjoy seeing the Park in the winter by snowmobile because we can enjoy the wonders of God's creation."

SUMMARY RESPONSE:

The purpose and need for action, including discussions of laws, regulations and executive orders that apply to winter use, are presented in Chapter I of the EIS.

SUMMARY COMMENT:

Some commenters stated that the parks should be managed like Denali NP by allowing use by dogsleds and mass transit.

SUMMARY RESPONSE:

See Decision to be Made in Chapter I of the EIS.

SUMMARY COMMENT:

Some commenters feel that snowmobile use is being singled out and attacked, while in their opinion summer visitors and autos have a greater impact.

SUMMARY RESPONSE:

See Scope of Analysis and Issues Not Addressed in Chapter I of the EIS.

SUMMARY COMMENT:

A number of commenters stated that park resources and values should be placed above economic interests or interests of gateway communities. For example, "I only hope that when decisions are made, that the mandate the NPS has to protect park resources prevails over the pressure to enhance local economics." "One thing that I feel is very important to address is that it appears that in almost every plan there appears to be an underlying if not blatant concern for the recreational industry over the environment." "Natural Resources' and 'Wildlife' should have much higher priority than 'Socioeconomics'." "The park is a part of every American's heritage and its pristine beauty should not be sacrificed for the benefit of a handful of people engaged in the business of renting snowmobiles." "I am concerned about gateway communities but they will find another way to make a living."

SUMMARY RESPONSE:

See National Park Service Mandates in Chapter I of the EIS.

SUMMARY COMMENT:

A number of commenters expressed opinions about the lack of financial feasibility of alternative B, or made general statements about Park Service's economic responsibility.

GENERAL EXPRESSIONS OF CONCERN

SUMMARY RESPONSE:

See National Park Service Mandates in Chapter I of the FEIS.

SUMMARY COMMENT:

A number of opinions were expressed that relate generally to the purpose and need for action, interpretations of NPS mandates, and how NPS performs (or doesn't perform) within the mandate. For example, "The ultimate goal is that of resource preservation." "The History of America", wrote President John F. Kennedy in 1963, 'has been the story of Americans seizing, using, squandering and belatedly protecting their natural heritage.' Why not start the new millennium by eliminating the first three elements of that list?" "Formulate a final Winter Use decision that cuts to the chase - that simply protects our natural heritage." "We are concerned about the resource damage which is occurring within the parks particularly about the air and water quality." "We need to start putting conservation before recreation, solitude before accessibility, and wildlife comfort before visitor comfort." "I don't understand why you would want to risk long term impacts on some of our most precious resources. I believe it is better to err on the preservation side of this delicate issue." "The National Park Service would not be doing its job if it did not protect the environment." "The very distinct natural beauty of Yellowstone cannot be sacrificed for any reason." "While National Parks should be accessible to all, parks like Grand Teton or Yellowstone should be principally reserved to preserve 'the wilderness of the world'." "This natural character of Yellowstone is about to be lost by accommodating too many people using the park in ways that damage the natural beauty, harmony and wild animal habitat." "Park Service is supposed to protect the park, it's wildlife and it's solitude, not to cater to snowmobilers. Please do what is mandated." "I believe that the habitats and environment of the park should be kept as natural and unpolluted (noise and air) as possible, summer and winter." "Isn't the Park Service a symbol of preservation of our natural wonders? Isn't the Park Service concerned about environmental degradation within our parks?"

SUMMARY RESPONSE:

The purpose and need for action, including discussions of laws, regulations and executive orders that apply to winter use, is presented in Chapter I of the FEIS.

SUMMARY COMMENT:

Industry had its chance and has failed to produce quiet and clean snowmobiles.

SUMMARY RESPONSE:

Opinions vary as to the Park Service's authority in this area. NPS has the authority to regulate the types of vehicles that can be allowed in the parks, but not authority to regulate private business or industry standards.

SUMMARY COMMENT:

General comments were made in regard to pollution, emissions relative to NPS and other legal mandates.

SUMMARY RESPONSE:

See National Park Service Mandates in Chapter I of the FEIS.

SUMMARY COMMENT:

General comments were made objecting to pollution controls on snowmobiles.

SUMMARY RESPONSE:

See National Park Service Mandates in Chapter I of the FEIS, Air Quality, and Public Health in Chapters III and IV.

Taxpayers Against Snowmobile Use

SUMMARY COMMENT:

As a non-snowmobiling taxpayer, I don't like the thought of my tax monies supporting Yellowstone if snowmobilers can use it. I don't wish to support access for recreation that damages park resources.

GENERAL EXPRESSIONS OF CONCERN	
<p>Taxpayers For Snowmobile Use</p> <p>SUMMARY COMMENT: Yellowstone Park is a place for all people to use, summer and winter. Snowmobilers have paid for and maintained the Park through our Federal tax money, everyone has a right to use that Park. I will not be willing to continue to pay taxes to support a park that we cannot use!</p>	
<p>Education and Information</p> <p>SUMMARY COMMENT: Every effort should be made by the NPS to educate the American public to the sensible use of natural resources for the benefit of present and future generations, and to keep our parks open and available for the public to enjoy.</p>	
<p>Enforcement</p> <p>COMMENT: In fact, the average of citations written per winter in Yellowstone for off-road snowmobile use from 1995-1999 was over 50 (23% of 890 snowmobile citations were for off-road travel or for closed areas, p. 101). We can assume that a significant number of violations are discovered or reported, and that a significant number are discovered but the violator is not caught so no citation is ever written.</p>	
<p>COMMENT: Despite the laws and regulations, snowmobiles are going almost everywhere. The parks currently are so occupied with the frontcountry users that the surrounding communities have free access to our most pristine treasures. That nothing has been done to stop the vulgarit; up to this point is truly criminal when one thinks that the "Organic Act" supposedly guides Park management decisions.</p>	
<p>COMMENT: I believe that the burden of control should fall largely on the shoulders of the outfits that make a business of renting out snowmobiles and the associated paraphernalia.</p>	
<p>COMMENT: Concerns expressed and discussed are subject to review and evaluation that survey responsibility in the area. Authority and ultimate responsibility lies with NPS.</p>	

SUMMARY COMMENT:

A number of comments related general concerns about enforcement, opinions about how enforcement is or isn't being done, speed limits, funding for enforcement programs, the need for increased penalties, judgments about various user groups who violate regulations, et al. Some comments are based notably in misinformation or uncertainty about national parks versus national forests, or about the scope of analysis for this EIS. For example, "Vigorously enforce speed limits, apart from other restrictions that should be imposed to maintain the natural ecosystem and bring back peace to Nature." "The Park Rangers were mostly unable to keep the snowmobilers under control." "Plowing roads into the interior of the parks also presents major problems for wildlife and for enforcement of illegal use by snowmobiles." "When you don't have the manpower to control salt baiting of elk at your borders now, can you promise you'll be ready to control back country abuses?" "The penalty for misuse of snowmobiles has to be made severe enough that there is a powerful incentive to obey the law." "To enforce the ban on snowmobilers in Yellowstone, are you planning to shoot people who trespass?"

Opposed to Closing Yellowstone**SUMMARY COMMENT:**

A number of comments expressed concern about closing Yellowstone National Park. For example, "I don't think that shutting down Yellowstone is the solution." "Please do not close this beautiful area to families and older people." "Please leave the park open all winter." "Please enter my name on record as being in favor of continued winter use in Grand Teton and Yellowstone Parks via snowmobile, as well as snowcoach, skis, and snowshoes." "I am against any more closures of our public lands." "Clinton-Gore extremists want to close the park."

Expressed Need for Compromise**SUMMARY COMMENT:**

For example, "I believe that if the Park Service and the snowmobile community can work together and utilize good management practices, all can benefit." "We must remember that some sacrifices are needed on our part in order for the best to be done for our parks." "We hope that the Park Service will find a way to bring the snowmobilers and the die-hard environmentalists to one table to thrash out a compromise." "We must work together to make Yellowstone a great place for everyone." "Simple reasoning tells us that the likely solution to any problem lies between the extremes."

COMMENT:

The "desired condition" includes reference to the need for cooperative work between the NPS and other entities. For that to occur, the planning process should foster a spirit of cooperation. However, the manner in which this document has been developed has tended to disenfranchise potential cooperators.

GENERAL EXPRESSIONS OF CONCERN

Concern about Equity for Different User Groups**SUMMARY COMMENT:**

Many people expressed the opinion that the parks should be open to all users. Most such comments were voiced from the perspective that their particular user group is being victimized by the other group and the park service. In many cases, it is difficult to tell from the context of the comment which user group is being represented, and which is the source of complaint. For example, "Please take the time to gather unbiased 'facts' about the presence of responsible snowmobiling in these areas before you bend to the political and special interest group pressure on such an important multiple use issue." "I believe the Park Service is not acting in the public's best interest but is operating on its own agenda and the agendas of narrow minded and selfish so-called environmental groups." "It is unfair to limit the winter use to only a 'few' that have the time and physical ability to access the park on skis, these are the few and the visitors on snowmachines are the 'many'." "I do not like the fact that the snowmobilers would have the park for 18 hours - from 5 A.M. to 11 P.M. each day." "Cross-country skiers and snowshoe enthusiasts should have more quiet time - why not a more equal split?" "To eliminate an entire user group without sound research -- and at the expense of the natural resource -- is wrong." "We need someone bold and brave enough to stand up and do the right thing for the park and not be influenced by Senators who are influenced by money." "It is a great privilege to use our parks and a noisy few should not be allowed to ruin the environment for the rest." "NPS is taking the side of the cross-country skiers." "I think the park service should give snowmobiles equal rights to access points." "I do not believe that the NPS should impose their own standards such as denying access to certain groups by plowing or closing roads, or by emission or sound control." "Managing by excluding a particular user group is not a proper way to manage. It's not fair, and in a sense a form of discrimination." "How come only the low-impact users like backpackers, river runners, and mountaineers get saddled with quotas and restrictions? Why can't you impose these on the motor lovers also?"

SUMMARY COMMENT:

Some comments expressed the need for equity in relation to all users, much as those who articulated the need for compromise.

Concern about Access for Seniors and Handicapped**SUMMARY COMMENT:**

A number of comments express the presumption of closure of the parks to snowmobiles and note that this action would eliminate available access by seniors and handicapped people. For example, "Its time to stop any more closures to our senior citizens and physically disabled people." "Some folks have physical disabilities that make it impossible to ski into the park, and riding a bus or snowcoach certainly does not give you the experience of really appreciating the grandeur of the park, while snowmobiling can get you a real feel for the Park."

GENERAL EXPRESSIONS OF CONCERN

Concern about Available Areas for Motorized Use**SUMMARY COMMENT:**

Comments stated general concerns from snowmobilers that land restrictions are locking out motorized uses, and from others stating that snowmobile use curtails enjoyment by the greatest number of people who would appreciate nonmotorized forms of recreation. Many comments indicated concern about closures that may happen outside the parks. For example, "I favor no plan that will shut down motorized access on any Federal Lands, especially in our National Parks!" "Expand use, not restrict it. Account for changes in machines that make them cleaner and quieter." "Individuals and groups who filed suits against the NPS are in the wrong and want to exclude everyone from winter use of the park." "To deny this wonderful experience, being at peace with oneself while absorbing some of the most beautiful scenery would surely be a crime." "The continued use and enjoyment by the people to use snowmobiles should be available." "We are all very concerned about the possibility of losing one of our favorite riding areas." "A true experience of beauty that needs to remain accessible for winter recreation vehicle use." "I feel our public land use should be preserved as is, not taken away!" "If you cut snowmobiling or make it impossible for a machine to meet your criteria, you will have essentially cut out a major income from, and use, of public land." "Anything that diminishes our ability to enjoy snowmobiling across the country is a threat to further closures, and eventually complete denial of access to any areas." "We realize it's a privilege to ride on public lands, but it's a privilege that's getting increasingly smaller as time goes by." "We keep losing land around Montana and Wyoming, and pretty soon we are all going to be locked out as far as snowmobilers." "I represent snowmobile readers, nearly 160,000 strong, nearly all of who are frustrated, angry, and fed up with the way we're being pushed out of public lands."

SUMMARY RESPONSE:

See National Park Service Mandates in Chapter I of the FEIS.

Snowmobile Trails**SUMMARY COMMENTS:**

A number of commenters wanted the Continental Divide Snowmobile Trail or the "Grand Loop" experience in YNP to be closed.

A number of commenters wanted the Continental Divide Snowmobile Trail or the "Grand Loop" experience in YNP to be maintained.

Some commenters wanted the Continental Divide Snowmobile Trail to be moved or made safe and usable during other seasons.

SUMMARY RESPONSE:

See Decisions to be Made in Chapter I of the FEIS, and alternatives in Chapter II.

SUMMARY COMMENT:

A number of commenters questioned the appropriateness of moving the Continental Divide Snowmobile Trail to a new location.

SUMMARY RESPONSE:

See Decisions to be Made in Chapter I of the FEIS, alternatives in Chapter II, and effects in Chapter IV.

COMMENT:

If the Continental Divide Trail is not relocated off of the highway then I would suggest that the trail be discontinued because of lack of interest and that the Potholes be reopened. The Potholes were far more popular than the Continental Divide Trail. The Potholes were closed as a tradeoff for the Continental Divide Trail. If any Winter Use Plan includes closing the Continental Divide Trail, then it should also include opening the Potholes.

GENERAL EXPRESSIONS OF CONCERN

During the review and drafting of the draft final report approving the FLEIS, it was noted that the rule change recommended for GFFNP is so preliminary that the National Park Service is recommending no wilderness designation. The decision does not indicate there was a conflict between GFFNP and FLEIS.

Seasonal Closures**COMMENT:**

Under current usage and policy roads are closed to public usage between seasons and are not reopened until designated dates. This policy allows usage by Park personnel and others for so called administrative purposes at public expense.

SUMMARY RESPONSE:

NPS is required under its mandate to actively manage the park. This is a year-round task.

Parks Should be Closed to Motorized Use**SUMMARY COMMENT:**

A number of comments expressed concern about the park and its resources, and stated that the park should be closed for purposes of protection.

SUMMARY RESPONSE:

See National Park Service Mandates and Decisions to be Made in Chapter I of the FEIS.

SUMMARY COMMENT:

Some commenters indicated that if the park is closed to some, then it should be closed to all.

SUMMARY RESPONSE:

See National Park Service Mandates and Decisions to be Made in Chapter I of the FEIS.

SUMMARY COMMENT:

A number of comments stated that snowmobiles should not be allowed in the parks. Some comments included general rationale for this: because they are not compatible with other resources, or that they don't belong, or for a number of other reasons. For example, "Snowmobiles are o.k. on National Forests but not in National Parks." "Snowmobiles have no place in our great and beautiful National Parks." "Snowmobiles do not belong in our national parks until they can be used without noise and air pollution." "Those blasted machines are terrible, noisy, they pollute, they frighten animals and like SUVs and jet skis, and should not be allowed in National Parks." "Snowmobiling is known for its damage to park resources and should be outlawed in the parks." "The use of snowmobiles in a national park is certainly a miscarriage of the intent for national park use." "Snowmobiles are hardly compatible with protecting and enjoying our country's National Parks." "I have been in years past a snowmobiler. It is a fun activity. I do not think that it belongs in the National Park system." "I am very strongly opposed to snowmobiles being allowed to destroy the environment and threaten the wildlife in our national parks." "I strongly believe that snowmobiles are incompatible with the more important goal of wildlife preservation within the National Parks." "This form of recreation [snowmobiling] is totally incompatible in Yellowstone, and you know it!" "I do not believe that snowmobiling and its negative environmental record are consistent with the Park's mandate." "Snowmobile use is incompatible with winter wildlife and with the pristine quiet of these areas in winter." "The NPS should determine whether any snowmobile use is appropriate for national park settings." "I think the national parks have a distinct mission that sets them apart from other federal and state lands that can provide the recreational experiences that snowmobilers are seeking. I do not feel that the parks are appropriate places for motorized recreation."

SUMMARY RESPONSE:

See National Park Service Mandates and Decisions to be Made in Chapter I of the FEIS.

GENERAL EXPRESSIONS OF CONCERN

SUMMARY COMMENT:

Some comments stated that snowmobiles should not be allowed in the parks except for emergency rescue.

SUMMARY COMMENT:

Some comments stated that all recreational motorized use should be eliminated in the parks, including snowcoaches. For example, "Can you fend off other ATVs, aerial trams, jet-skiing, heli-skiing, paragliding, ice-boating, whitewater kayaking, and future forms of recreation that are not yet even visible on the horizon?" "In addition to restricting snowmobiles and ski jets we should also restrict RVs and outright disallow use of generators in camping areas." "Snowmobiles in Yellowstone are a perfect example of why off-road vehicle use must not be allowed to become improperly established on public lands without a thorough examination of all potential impacts." "Snowmobiles, jet skis and A.T.V.s are turning America's National Parks into techno-Disneylands." "I believe those who developed our NPS philosophy would be strongly opposed to the continued development and increase of mobile recreational use when it is so devastating to wildlife and the parks themselves."

Do Not Regulate Backcountry Skiers**COMMENT:**

I think skiers can regulate themselves. As Lieutenant Frederick Schwatka and F.J. Haynes discovered in the winter of 1886-87 backcountry skiing and camping is in the truest sense experiencing Yellowstone's Winter Wonderland. Please don't take that away.

No Additional Motorized use**SUMMARY COMMENT:**

Some commenters stated they wanted no new winter motorized routes, expanded areas or other amenities for motorized use.

Concern About Motorized Use Being Displaced**SUMMARY COMMENT:**

Some comments stated that snowmobiles would be displaced to national forests where there are already problems. The note that displacement would cause additional damage and the forest service would follow suit and shut down use on the forests.

COMMENT:

Have you thought about the likely displacement of snowmobiles to other, traditionally quieter, areas of the park when they can no longer enter through West Yellowstone?

*Desired And Existing Conditions***SUMMARY COMMENT:**

The document is also unclear as to the purpose and need for the proposed action. In this instance, the DEIS defines the problem by referring to the difference between existing and desired conditions without making a case for why such an abrupt change in current management is necessary or warranted.

COMMENT:

In the Desired Condition section of the DEIS, the NPS spends an inordinate amount of time discussing the visitor and visitor needs. Remember that the visitor is important in that they do not adversely impact sensitive natural resources, air quality, wildlife, cultural areas, or the experiences of other park visitors. This must be made the driving mandate of this planning process. Are "enhanced visitor experiences" attainable when in violation of the above mandate? The preferred alternative does not call for an actual reduction of impacts but simply some mitigation on the increase in use and problems. Little attempt is made to achieve a desired condition other than via lip service.

COMMENT:

A summary statements of desired condition says (v)isitors know how to participate safely in winter use activities without damaging resources. The DEIS completely ignores how to meet this in reality. Another: "(s)nowmobile sound and emission levels are reduced to protect employee and public health and safety, enhance visitor experience, and protection of natural resources." How can this be accomplished if no efforts to restrict or reduce the tremendous growth we have seen in snowmobile use in the parks? Elimination of individual vehicles would accomplish it better than any other method beyond doubt.

COMMENT:

We recommend that NPS replace the words "Snowmobile emissions" with "Over-snow vehicle emissions." Emissions are not just from snowmobiles, and eliminating snowmobile emissions may not entirely solve air quality concerns. For example, emissions also can be reduced by changing the engines in pre-1971 vintage snowcoaches (that produce about 1,000 grams CO per mile) with newer engine technology having emissions controls when engines are replaced every 2 to 5 years. Page 27 has the proper reference. We also recommend NPS replace the word "noise" with "sound".

PURPOSE AND NEED

COMMENT:

Table 2, Management Prescription Zones, -Resource Condition or Character: The terms "good to excellent air quality" are not defined. It would be more appropriate to speak in terms of air quality degradation resulting from the Management Prescription compared to the current condition. We would recommend changing "good to excellent air quality" to "Reduced air quality degradation" or "improved air quality" for zones 2-7, "No impact on Air Quality" for zones 8-11 to the "maximum allowed by law (approaching exceeding the NAAQS) for zone 1."

COMMENT:

Table 2, Visitor Experience, Zone 2 Plowed Road: If snowmobiles were replaced with busses and automotive traffic, the vehicle exhaust might not "provide a sense of being in a natural park environment." For this zone, many of the visitors would travel by shuttle or personal vehicle, while others would travel by snowshoe and ski. The dispersion of emissions is typically worse in winter than in summer. Persons exposed to trapped levels of exhaust in and around roadways might not have the experience the sense of being in a natural park environment. Complaints of soot and odor from tourist busses and Park Service maintenance equipment have occurred in the past, and need to be considered in any alternatives.

COMMENT:

Within Chapter 1, the DEIS discusses "differences between desired conditions and existing conditions". How do the comments on Desired Conditions (pages 3 & 4) correlate to the lack of support for the preferred alternative and the statement that there is a consistent picture of very low support among current winter visitors to the GYA for the management change contained in alternative B" (page 200)?

SUMMARY COMMENT:

The difference between desired and existing condition establishes the purpose and need for action. The description of the existing condition would have been more useful if it had been presented as direct and specific comparisons with each of the elements in the desired condition. As presented, there is no clear indication for what the specific problems are (i.e. The purpose and need for this DEIS) or what needs to occur to resolve the differences.

PURPOSE AND NEED

COMMENT:

The statement (page 4, visitor issues) suggests that the present levels or kinds of winter use exceed the capacity to provide the quality of visitor experiences and adequate protection of park resources. But the DEIS does not further address the carrying capacity issue.

COMMENT:

Although as stated here that "economic development interests in communities expect support from land management agencies," these agencies, and especially the NPS, are not obligated to support such development interests.

COMMENT:

Page 4, Existing Conditions: The discussion on Existing Conditions contains many statements which are beliefs. This should be more clearly explained to the reader or changed to be qualitative. For instance, under Visitor Issues, is the conflict between user groups or individuals a real conflict or is it perceived by some? Also, under Resources, do "many people" expressing concern mean the problem exists? These concerns may or may not be valid.

NPS Mandate**COMMENT:**

We would like to see the Purpose and Need section address society's growing need for a diversity of recreation, what recreation means to all of us, the need to maintain existing motorized recreational opportunities and the need to create new opportunities for snowmobilers.

COMMENT:

Viable alternatives and means to provide long-term benefits and improvements to public health and safety as well as that of the park units wildlife and natural resources should be of the utmost concern.

COMMENT:

If the issues and concerns, or the emphasis placed on these topics, are not consistent with federal law and NPS regulations and policies, then either the topics or the emphasis must be changed.

COMMENT:

Though the winter use management concepts were evaluated in terms of the decision to be made, nowhere in the Draft EIS does the NPS define what that decision is.

COMMENT:

The NPS must disclose the origins of these desired future conditions and must reevaluate them in regards to those types of winter recreation opportunities which can be permitted and which are consistent with legal standards.

SUMMARY COMMENT:

Many commenters restated in their own terms the purpose and need for action expressed in the DEIS, or described their concept of the park mandate. Winter recreation in the GYE is growing by leaps and bounds with often-times deleterious impacts on both the environment and the winter recreational experience. Visitors and residents alike are complaining about overcrowding, conflicts between use groups, safety, resource damage and trespassing as growing problems associated with winter activities. We need to restore balance to the winter use of our National Parks.

COMMENT:

The DEIS does not adequately describe the current winter use relationship between the greater Yellowstone area (GYA) and the parks. Furthermore, the lack of a clear management relationship between these land segments does not allow for the formulation of mitigative strategies for outcomes outside the parks produced by those alternatives A through G listed in the draft EIS. The proposed alternatives in the DEIS may have an adverse effect on those strategies and desired outcomes developed in the Greater Yellowstone Coordinating Council's (GYCC) "Winter Visitor Use Management" document. This land relationship is missing in the DEIS.

PURPOSE AND NEED

The purpose and need of the proposed action is to provide a safe and efficient route for the shuttle bus service within the National Park System. The purpose and need of the proposed action is to provide a safe and efficient route for the shuttle bus service within the National Park System. The purpose and need of the proposed action is to provide a safe and efficient route for the shuttle bus service within the National Park System.

SUMMARY COMMENT:

Many commenters expressed their opinion about park service mandates, including laws, regulations, executive orders and policies, as a basis for stating what the park service MUST do. E.g. NPS regulations specify that snowmobiling can only be permitted where it will not "disturb wildlife or damage park resources." Now is the time for the National Park Service to live up to these obligations and fully protect this country's premier wildlife Parks. Prohibiting snowmobiles and trail grooming would be consistent with the long-standing mission of the Park Service, recent initiatives of this Administration and the will of the American people.

SUMMARY RESPONSE:

In effect, these commenters are addressing the decision that is yet to be made. In accordance with CEQ regulations (NEPA), a range of alternatives must be considered before making the decision. The EIS presents an extensive range of alternatives (and alternative features) that deal with specific winter recreation issues. Analysis of the potential adverse effects of the alternatives, compared to the mandates for park management, will guide the decision maker. A discussion of the decision to be made has been added to the EIS to clarify the decision making process.

SUMMARY COMMENT:

The purpose of the National Park system is to protect our national treasures over the long term. It is not the purpose of the park system to provide economic opportunities to the surrounding communities.

SUMMARY RESPONSE:

The park service mission is to protect park resources and values for enjoyment by future generations. All the mandates discussed briefly in Chapter I of the EIS and EIS summary on this governing statement. National Parks are public lands – in fact, in the nation is that these lands can be enjoyed by the public in the future that is consistent with resource protection. Economic opportunities are allowable in this context.

SUMMARY COMMENT:

The NPS helped create a healthy, viable snowmobile industry in West Yellowstone and cannot arbitrarily eliminate that use now. NPS is obligated to support economies of dependent local communities.

SUMMARY RESPONSE:

The park service mission is to protect park resources and values for enjoyment by future generations. All the mandates discussed briefly in Chapter I of the EIS and EIS summary on this governing statement. National Parks are public lands – in fact, in the nation is that these lands can be enjoyed by the public in the future that is consistent with resource protection. Economic opportunities are allowable in this context, but NPS is not obligated under its mission to provide them.

COMMENT:

The proposed shuttle bus service would require a certain amount of subsidy from taxpayers, which is inconsistent with recently stated NPS intention to make park visitation more self supporting by increasing fees.

SUMMARY RESPONSE:

It would be in the purview of the decision to be made to consider the pros and cons of various alternatives considered and determined which can best meet the purpose and need for action.

PURPOSE AND NEED

COMMENT:

There is no need for motorized "trails" groomed or otherwise. These "zones" are common on GYA public lands surrounding YNP and GTNP, and the Park Service is under no mandate to provide these prescriptions.

SUMMARY COMMENT:

Some commenters believe that the multiple use concept applies to national parks. E.g. Some motorized noise, such as airplanes, exists even in the most remote areas and it is not reasonable to expect absolute quiet in areas intended for multiple-use by the public (roadways of the Park). Present winter use plan is abusing multiple use concept. Public land should be for the public, multi-use.

COMMENT:

Any Winter Use Plan for either the BLM or the National Forests should comply with Federal Multiple Use Laws. It should not be implied or redefined that these entities are under any of the National Parks control, multi-agency committee guidelines, or proprierted missions.

Legal Framework**COMMENT:**

...the EIS must contain a comprehensive analysis of its statutory and regulatory mandates and how these mandates apply to snowmobile use. Specifically, is snowmobiling, as we know it today, even authorized under the legislation establishing Yellowstone National Park?

COMMENT:

Laws such as the Organic Act, the Endangered Species Act, and the Clean Air Act, as well as court cases (i.e. SUWA vs. Dabney) and executive orders 11644 and 11989, direct the NPS to prohibit any recreational activity that causes lasting damage to park resources and wildlife.

SUMMARY COMMENT:

The Park Service is in violation of its mandates under the Organic Act, the Endangered Species Act, the Clean Air Act, Clean Water Act, et al., in its preferred alternative, or any alternative that allows snowmobile use.

COMMENT:

The legislation of 1916 and the Historic Sites Act of 1935 mandate NPS to preserve cultural and natural resources. Upon on (sic) my review [of these laws], I did not locate a section on preserving human access rights, nor the economies of adjoining cities.

SUMMARY COMMENT:

The "Citizens' Solution" follows the intent of the Organic Act as well as the enabling legislation of both Parks. In addition, it adheres to the objectives of EO 11989 covering the use of ORVs on public lands.

COMMENT:

Under the Clean Air Act, Organic Act and NPS Management Policy, the excessive pollution of two-stroke engines is clearly prohibited. Fortunately, the parks have a four-stroke mode of access available and in place in the parks: snowcoaches.

SUMMARY COMMENT:

Many people interpret the benefit language to mean that it is part of the NPS mission to provide economic opportunity, personal motorized access, and recreation so long as those opportunities do not pose long-term detrimental impacts on the park resources.

COMMENT:

Contrary to the Park Service's assertions, there is no dual or conflicting mandate in management of national parks. The principle mission of the NPS, as dictated by Congress over 80 years ago, is to preserve nature as it exists.

COMMENT:

It should be noted that legislation establishing YNP, GTNP, or JDRMP did not explicitly or implicitly mandate that snowmobiling be permitted in the parks, nor did they suggest that the public must be afforded access to the Parks, by any means, during the winter season.

SUMMARY COMMENT:

Snowmobiling and trail grooming clearly violate these legal standards [Organic Act] by continue to be permitted in the Parks because of political and local pressures.

COMMENT:

Use of national parks and recreational areas is no one's right. It is a privilege which is granted to use by the government, whose responsibility it is to keep safe the plants and animals of the park they promised to protect by the act of generating the park itself.

SUMMARY COMMENT:

The NPS is mandated by the Park Service's Organic Act and the General Authorities Act "to protect park resources and provide for the enjoyment of those resources in a manner that leaves them unimpaired for future generations." Without knowing the carrying capacity of these parks, the NPS can not claim to be meeting the intent of these Acts.

COMMENT:

Prohibiting snowmobiles would be consistent with the longstanding mission of the Park Service, recent initiatives of this Administration, and the will of the American people.

COMMENT:

I urge that the National Park Service give full consideration to a winter use plan that would prohibit snowmobiles, snowcoaches, and trail grooming. Failure to do so violates the National Environmental Policy Act.

COMMENT:

NEPA provisions regarding cooperating agencies are clear: cooperators are those agencies that have jurisdiction by law or special expertise, and are intended to assist the lead agency in analyzing impacts and providing data. Decision-making authority is retained by the lead federal agency, in this case, the National Park Service. From the very beginning, local and state cooperators attempted to assert themselves as decision makers in this EIS process. We repeatedly raised concerns about the inconsistent and inappropriate role of the cooperators. We also vehemently object to a provision in the MOUs prohibiting the release of working documents outside a Freedom of Information request or similar state process. State and local cooperators are all participating as elected representatives. All documents available to the cooperators should and must be made available to the public. The cooperating agencies do not have an accurate understanding of cooperating agency status. The NPS did not clearly establish and follow the conditions under which cooperating agency involvement can occur. Far from improving the efficiency of the process and maximizing coordination and cooperation, this NEPA process has become contentious, exclusionary, and biased toward special interests (the local business communities) because of the local and state cooperating agency involvement. If this precedent-setting arrangement is to continue effectively, efficiently and within the bounds of current statutes and regulations, the NPS must indicate clearly and concisely what those conditions are. The NPS must make it clear that it will solely retain decision-making authority in this winter use planning effort.

SUMMARY COMMENT:

There is no scientifically legitimate or legally defensible reason to wait another decade to improve public health and air quality within the Class I airsheds of Yellowstone and Grand Teton National Parks. The Clean Air Act states that the National Park Service, as a federal land manager, has "an affirmative responsibility to protect air quality related values, including visibility, from the adverse effects of air pollution in areas that are designated as "Class I".

COMMENT:

Under the Clean Air Act and NPS policy, the Park Service must mitigate or eliminate impacts to air quality currently arising from snowmobile use in the park. No means currently exist to mitigate these effects. Fortunately, the means to eliminate them do exist. Four-stroke machines for oversnow access are currently used in the park in the form of snowcoaches; this mode of access must replace that of two-stroke motorized access. Snowcoaches accomplish the desired conditions the Park Service seeks in this planning process--air quality improvement, noise reduction and reduction of vehicle number.

SUMMARY COMMENT:

The Park Service must adhere to executive orders 11644 and 11989 in its preferred alternative, or any alternative that allows snowmobile use. The EIS should include further explanation of the applicability of these executive orders.

COMMENT:

Alternative B-Preferred Alternative-is by far the best approach to consider because it includes an increase in accessibility along with monitoring and evaluating techniques for wildlife and resource impacts under the Executive Order 11644 and its implementing regulation (36 CFR 2.180).

COMMENT:

How does this executive order (11644) apply with the use of existing interior park roads? What significant impacts are there to this travel corridor, which is historically and significantly impacted on a daily basis nearly 365 days a year? Additionally, winter motorized use in the parks is confined to a specific travel corridor versus nonmotorized use that is dispersed. What impacts have there been from off-trail use of snowmobiles or summer vehicle travel, defined by the executive order? By plowing the road impacts may very well increase, not decrease. If one examines the statement from the executive order ("off-road vehicle use will not adversely affect natural, aesthetic, or scenic values") what is the difference of impacts on these resource by snowmobile use and that of summer vehicle use along the road corridor? Without substantiated data of impacts to the stated resource values, how can NPS select or propose alternative based on this order?

PURPOSE AND NEED

COMMENT:

The NPS efforts to placate those opposed to snowmobiling and trail grooming by suggesting that sections of the Parks could be closed, depending on the results of scientific studies, is not acceptable. Once again the NPS, in its ongoing efforts to promote winter use, has clearly decided to continue permitting winter use activities until it can be shown that they are adversely affecting the Park, instead of requiring those who want to snowmobile in the Park to prove that their activities result in no adverse impacts to the Park and its wildlife. Furthermore, Executive Order (EO) 11644 places the burden of proof upon the National Park Service to assure that there are no adverse impacts upon natural values before any snowmobiling can be permitted.

RESPONSE:

There has been no attempt on the NPS side to placate the public. The statement of purpose and need in the DEIS and the FEIS refute the argument, because current conditions have been identified as unacceptable, and a need for change is evident.

SUMMARY COMMENT:

National Park Service Regulations specify that snowmobiling can only be permitted where it will not "disturb wildlife or damage park resources." Snowmobiling and trail grooming clearly violate these legal standards and cannot continue to be permitted in the Parks merely because of local political pressure.

SUMMARY RESPONSE:

Regulation and policy are clear that snowmobile use can be allowed if it is consistent with the parks' natural, scenic and aesthetic values and will not disturb wildlife or damage park resources. The purpose of the FEIS is to disclose the environmental effects of a proposed action, including snowmobile use, and alternatives to it. The decision to be made will protect fisheries as to the adverse impacts of winter uses on natural, aesthetic or resource values pursuant to regulation. Until such findings are made and supported by the FEIS, it is premature to draw conclusions about snowmobile use in the three park units.

SUMMARY COMMENT:

We have recently received and reviewed a copy of the Park Service's Tourism Policy, Director's Order #17, in which policy 4.16 states: "It is the National Park Service policy to establish a common understanding on what is needed to ensure adequate protection of those resources for present and future enjoyment and how this can contribute to sustainable park related businesses and economies." Upon review, it is obvious that there has been no "common understanding" established. With the selection of alternative B as the preferred alternative, it is clear that the National Park Service is in violation of its own policy and the MOA for winter use.

SUMMARY RESPONSE:

First, a decision is not made until the final EIS is published and there is a subsequent record of decision. The designation of a preferred alternative in a NEPA document does not constitute a commitment as a management policy. The preferred alternative indicated in the FEIS is different than that in the DEIS, so this particular issue is under review. In the FEIS, the new trail is proposed to be constructed and NPS would accept that the DEIS and the FEIS represent good faith efforts fully consistent with NEPA to achieve this goal. The new trail is being built in the core to carry out the purpose of restoring park related businesses and economies, as required by this law. It is imperative that park resources be managed by such as to ensure that the park is not in jeopardy in any way. The MOA is an assurance of the protection of EIS and the EIS regulations. It does not guarantee a decision that the MOA meets the needs of the approval of the administrative agencies who signed the MOA.



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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